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PUBLIC COMMENTS AND  
RESPONSES TO COMMENTS

AN APPENDIX  
TO THE WATER QUALITY MANAGEMENT PLAN  
FOR THE UPPER HOUSATONIC RIVER

FINAL PLAN/ENVIRONMENTAL IMPACT STATEMENT

September 1978

Prepared By:

The Berkshire County Regional Planning Commission  
10 Fenn Street  
Pittsfield, Massachusetts 01201

U. S. Environmental Protection Agency  
Region I  
J. F. K. Federal Building  
Boston, Massachusetts 02203



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## TABLE OF CONTENTS

|                                                               | <u>PAGE</u> |
|---------------------------------------------------------------|-------------|
| <u>FEDERAL</u>                                                |             |
| Environmental Protection Agency, Region I                     | 2           |
| Department of Housing & Urban Development, Area Office        | 12          |
| Department of Transportation, Federal Aviation Administration | 13          |
| Department of Agriculture, Forest Service                     | 14          |
| Department of Agriculture, Soil Conservation Service          | 15          |
| Department of the Interior, Northeast Region                  | 16          |
| <br><u>STATE</u>                                              |             |
| Department of Environmental Quality Engineering               | 26          |
| Division of Water Pollution Control                           | 31          |
| Division of Water Supply                                      | 42          |
| Department of Community Affairs                               | 43          |
| Department of Public Works                                    | 47          |
| Executive Office of Environmental Affairs                     | 50          |
| Massachusetts Historical Commission                           | 58          |
| Department of Commerce and Development                        | 59          |
| Office of State Planning                                      | 62          |
| Connecticut Department of Environmental Protection            | 66          |
| <br><u>LOCAL</u>                                              | <br>75-102  |



FEDERAL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

May 26, 1978

**RECEIVED**

JUN 1 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

Mr. Rick Holmes  
208 Project Director  
Berkshire County Regional  
Planning Commission  
Ten Fenn Street  
Pittsfield, MA 01201

Dear Rick:

Attached are my review comments on the Berkshire County RPC Draft Plan/EIS. Also attached are preliminary copies of the Regional review sheets which are separated by planning elements from the regulations. I have tried to cross reference the BCRPC chapters to the appropriate regulation numbers to ease your synthesis.

I have received copies of comments from many State and Federal agencies but in talking with you, Bob Mendoza and Dave Terry it appears that none of us may have a complete set of comments. Therefore, we should probably get together soon to exchange information and discuss the transition requirements between the draft and final stages.

I will be looking forward to meeting with you in the near future.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bill".

William W. Nuzzo  
Water Quality Branch

attachments

cc: D. Terry  
R. Mendoza

Water Quality Branch Review of BCRPC Draft Plan/EIS

W.W. Nuzzo 5/26/78

1. Typos, Corrections and Deletions

- A. Page B-15 mentions 25 cfs low flow augmentation. Figures B-5 and G-4 utilize 22 cfs.
- B. Page 1 of Town Summary -- ...storms may clean the town of city streets
- C. Table D-1 "Lake Conditions" should define conditions 1,2,3,4.
- D. Page **D**-13 "Control Measure" number 8 is not labeled.
- E. Page D-28 first and second paragraph refers to Table D-5. This should probably be Table D-11.

2. Land Use (Chapter C)

Regulations: Inventories and Projections [131.11(c)]

- A. Page C-12 states that "NPS is not sufficient to justify controls...". Table J-1 indicates that erosion related NPS are significant with relation to sediments and coliform. Other sources identify P-loading from NPS as significant. Land use guidelines to reduce erosion should be proposed (e.g. buffer strips, slope guideliens, construction practices).
- B. PCP calls for identification of critical water quality impact areas on a scale of 1:24,000. Has this information been plotted and transmitted to the towns?
- C. PCP states that specific town by-laws will be drafted for each community. Have these specific by-laws been drafted and transmitted to the towns?
- D. Individual town-by-town land use constraint maps are called for by PCP. Have these maps been prepared and submitted to the towns?
- E. The Land Use Chapter (c) states that low growth is expected except in less populated areas. What are specific recommendations to these less populated towns to avoid problems with on-lot disposal systems? (e.g. a sewer avoidance program in Connecticut).
- F. Since most land use change appears to be from farm land to light residential, are there any State farm preservation programs applicable? Are any recommended by BCRPC?

1. Municipal Waste Treatment Needs; Chapter G, Chapter F

Regulations: Point Source Load Allocations 131.11(g); Total Maximum Daily Loads 131.11(f); Municipal Waste Treatment Needs 131.11(h).

A. Housatonic River

1. Connecticut sent letters to EPA, Massachusetts and NEISWPCC strongly objecting to the Pittsfield by-pass of Woods Pond and requesting P-removal at Pittsfield and analysis of the results.
2. Connecticut just received a report from FMC on P-removal at Danbury. Conn. DEP is reviewing this report and will be making a decision soon on P-removal facilities at Danbury and Bethel.
3. A survey of the Housatonic is scheduled for the summer of 1978 by MDWPC and Connecticut DEP. Pittsfield is required by NPDES to provide P-removal May through September, 1978.
4. Plan does not adequately assess the down stream affects of Pittsfield discharge or Woods Pond by-pass on P-loading in Connecticut portions of the Housatonic. Various P-removal alternatives and the cost comparisons should be included. Plan also needs additional analysis consideration of storage option.

- B. 1. Plan should include recommendations to MDWPC on funding priorities for 201 facilities grants. The grant condition was partially complied with during Phase I but recommendations were not finalized or presented.
2. Abatement dates and recommended schedules should be included.

C. Stockbridge

1. There is a difference in the 201 and 208 recommendations on sewerage Stockbridge Bowl. The resolution of the 201/208 conflict should be undertaken at the earliest possible time.
2. BCRPC has recently received additional information on septic tank failures in the Bowl area that may warrant revision of their plan. This data should be summarized in the final plan.

D. Combined Sewers

Regulations: 131(1)

1. Berkshire County's plan did not recommend complete sewer separation in Great Barrington (GB) due to high costs of project. The recently completed 201 in GB shows cost figures substantially lower than BCRPC's estimates. Therefore, it is likely that the 208 plan will be modified to incorporate the completed GB combined sewer report.
2. The Plan should contain a summary of the recommended approach for GB.

E. Septic Tanks and Septage Management

1. Septic tanks have been identified in the plan as being an increasingly important problem in BCRPC. The analysis of recommendations concerning the towns capabilities of managing septic tanks was not adequate. Plan lacks specific analysis of town's capabilities and the recommendations for alleviating the problems.
2. The concept of regional septage management district or specific intertown agreements to share sanitation services have been suggested on numerous occasions. Smaller towns would benefit from such institutional arrangements if fostered by 208.
3. Septage management alternatives should be discussed in more detail. What are priorities and schedules for constructing the needed septage handling facilities? Have the inter-town arrangements been drawn up or recommended?

F. Residual Sludge Disposal

Regulations: 131.11(k)

1. No evaluation of capacities of municipal sludge disposal areas. The plan should provide specific recommendations for sludge disposal.

4. Industrial Waste Treatment (Chapter F and G)

Regulations: 131.11(i), Residuals 131.11(k)

- A. BAT as previously described was not recommended in the plan. New BAT requirements will necessitate revising BAT costs and recommendations.
- B. Assessment of industrial pretreatment requirements and towns' sewer use ordinances were not provided as required by the PCP.
- C. Industries are filling up available sludge disposal sites. Plan lacks adequate assessment of current and future problems with sludge disposal. Plan should make specific recommendations for disposal practices and management agencies.
- D. Problems associated with PCB's from industrial landfills was not discussed.

5. Non-Point Source (Chapters D and J)

Regulations: NPS Assessment [131.11(d)], NPS Control Needs [131.11(j)]

- A. Erosion sources (Table j-1 page J-4) have been judged to be a significant pollutants. Sources of erosion have not been adequately identified. The Plan states NPS are considered not consequential and only good housekeeping practices are recommended.
  1. Good housekeeping will not control erosion sources.

2. Plan should identify sources and establish priorities.
  3. BMP's for erosion control should be listed.
  4. Recommended BMP's and management agencies should be included.
    - a. What about construction practices?
    - b. What about buffer strips?
- B. Chapter C presents a good assessment of the status of land use controls and description of potential land use controls, but does not propose specific land use by-laws for specific towns.
- C. 1. Chapter D attributes certain P-loads to livestock but no BMP's have been suggested. No agricultural BMP's or management agencies have been recommended.
2. Although the P caused by construction practices may be minimal, recommendations for the control of construction practices should be made to the towns.
  3. Plan recommends stronger management of septic systems. It does not spell out who will carry this out and with what resources.
  4. Land use control measures reviewed in Table C-4 indicates there are large gaps in management needs. Plan should strongly endorse or recommend land use control changes needed.
  5. Lake clean up programs will rely heavily on 314 grants and voluntary compliance administered by towns. What about recommendations concerning various lake preservation associations or commissions. There is a need for inter-town agreements to manage the lakes bordered by more than one town.

D. Groundwater Protection (Chapter E)

Regulations: Nonpoint Source Control Needs 131.11(j)

1. The plan does not present site specific recommendations for dealing with present threats to aquifers. (e.g. What to do with existing landfills over aquifers).
2. Groundwater threat by PCB's not discussed. Even though PCBs were not required by PCP, plan should outline Berkshire County priorities of concerns.
3. Only limited PCB studies have been accomplished by the States and EPA. Plan should note that at the present no major studies are underway.

E. Agriculture Related

Regulation: Non Point Source Control Needs 131.11(j)

1. Assessment of agriculture related NPS was weak. Better

identification of sediment sources and problem areas needed. Priorities need to be established and BMPs should be listed for each problem area.

2. No rural NPS control management agencies or practices were recommended in the plan.
3. To be eligible for financial assistance under the Rural Clean Water Program (Culver Amendmenet) the project must be included in an approved agricultural portion of the 208 plan. The agricultural portion of the 208 plan must:
  - a. Show that significant agriculture NPS problem exists based on an adequate assessment;
  - b. Contain a list, in priority, of the NPS problem areas and sources;
  - c. Identify the BMPs to control problems;
  - d. Designate a management agency to implement agricultural section of 208.

F. No target abatement dates were provided for the correction of NPS.

6. Urban Runoff (Chapter I)

Regulations: 131.11(1)

1. BCRPC recommends a waiver of stream standards and general good house-keeping practices. No specific BMPs are recommended; schedules of implementation are not listed; planning and zoning recommendations were missing; no mention was made of buffer strips or green belts.
2. Plan should at a minimum evaluate the capabilities of recommended management agencies to carry out control programs.

7. Legal, Institutional and Financial Arrangements (Chapter K)

Regulations: 131.11(0) Management Agencies

- A 1. The 208 plan is to identify 1) those agencies to construct and operate treatment works and 2) those agencies necessary to implement the regulatory programs described. BCRPC seems to have concentrated on the requirements of the first type of management agency and, therefore, unduly restricted its consideration of management agencies for NPS control to those that met the restrictions in page K-2.

2. The plan did not include an evaluation of the existing management systems as required by the PCP.
  3. Recommendations for management agencies for individual portions of the plan ~~of the plan~~ should be more specific than municipal government. Subunits of municipal government should be recommended to provide specific functions. What are the resources and capabilities of subunits that are recommended?
  4. Recommendations for increasing eligibility of 201 and 208 funds are described in Chapter K are not likely in the near term. Cost associated with Federal and State actions should be adjusted to more closely follow current potentials (i.e. it is not likely that 208 funds will be available to hire septic tank inspectors as described on page k-23).
  5. Plan should show cost estimates using currently available funding resources and policies. BCRPC recommendations for State and Federal funding and policy modifications should be listed separately for easier understanding.
- B. Regulations: Water Quality Standards 131.11(e)
1. The desirability of attaining fishable/swimmable goals at all times on the Housatonic is addressed at numerous points in the plan. Documentation of BCRPC's case should be strengthened and available for presentation to MDWPC. Did BCRPC make an official statement during Massachusetts Standards hearing held during 1977-1978?
    - a. Recommendations to relax coliform standards should have further backup **information**. What are the health risks to downstream users. Costs associated with meeting standards are presented; costs associated with not meeting standards should also be present.
    - b. Draft plan does not provide adequate data and analysis to recommend waivers of stream standards on non-compliance with 1983 goal of the Act.

## SOURCE OF COMMENTS

U. S. Environmental Protection Agency, Region I  
Water Quality Planning Branch, William Nuzzo

RESPONSES - Numbering is the same as in the review comment letter.

1. Corrections have been made to the errors noted.
- 2.A. Page C-12 indicates nonpoint source controls in four major areas is justified: near lakes and tributaries; over major groundwater sources; stormwater runoff, and, septic system management. Table J-1 indicates that erosion related sediment and coliform is a significant problem under high flow conditions. The question of coliform levels during storms is a complex one and is thoroughly reviewed in Chapters H, I and J and appropriate recommendations made. High flow sedimentation is a condition which is infrequent and brief, and aquatic species are believed relatively well adapted to brief sediment perturbations. For large projects, erosion controlling construction practices are recommended in the stormwater runoff Chapter. (See I. 6.4). Other land use guidelines are also recommended, including buffer strips around lakes and their tributaries, lake watershed slope guidelines, etc. The lake management Chapter provided an extensive analysis and control program for phosphorus loading that was contributing to lake eutrophication.
- 2.B. This data has been gathered and published at a scale of 1:48,000 so that it could be more widely disseminated to the towns and citizens as part of the report itself. Larger maps of critical areas have been provided as requested to communities which are planning to make them part of their local bylaws.
- 2.C. Both model and town-specific bylaws have been prepared. A number of selected model bylaws were sent to the towns. However, a full package of either model or specific bylaws was not sent to a town without guidance or advice because it would have been overwhelming and counterproductive. Instead the BCRPC has, and will continue to, work with each town in developing the specific bylaws it feels it needs.
- 2.D. A development constraints map has been prepared which shows each town at a scale of 1:48,000. Though this map is not a reproducible, and was not sent to each town, its critical contents were incorporated into the development guidelines map which was printed and more widely distributed through each town.
- 2.E. Though the rural areas are expected to have relatively more growth than the urban areas, their growth rate is not rapid. The three smallest towns (Monterey, Hinsdale and Stockbridge) will only average an annual growth rate of 1% over the next 25 years. Moreover, these towns are sparsely settled and overcrowding should not be a problem. Improvements to septic system management practices for all towns are recommended in the expanded Section 3.0 of Chapter F.

- 2.F. Although the land use changes appear to indicate that agricultural land is being converted to residential, this is not really the case. The net effect of the land use changes is that residential rises and agricultural declines, but not one at the expense of the other. In effect, most abandoned farmland is reverting to forest. Although the BCRPC is concerned about the status of farmland in the region, farmland preservation measures are beyond the scope of this report. However, the BCRPC did not recommend "management of manure", "manage crops per S.C.S.", or "locate livestock out of basin" in the lake management chapter in order not to impose additional costs on economically troubled local farmers.
- 3.A. Comments are addressed in Chapter G.
- 3.B.1 Construction grant priorities are described in Section 5.3 of Chapter F.
- 3.B.2 Schedules for sewer extensions are shown in Figures F-1 through F-7.
- 3.C. Changes have been made in Chapter F to resolve 201/208 conflicts.
- 3.D. Changes have been made in Chapter H to incorporate 201 report findings.
- 3.E. Septic system management and septage disposal program, Section 3.0 of Chapter F, has been expanded.
- 3.F. Sludge disposal recommendations have been clarified in Section 4.2 of Chapter F.
- 4.A. New BAT requirements are noted in Section 5.3 of Chapter F.
- 4.B. Draft Plan/EIS provided requested information, see Section 4.0 of Chapter F.
- 4.C. Same response as 3F above.
- 4.D. See Section 11.0 of Chapter A for discussion of PCB's.
- 5.A. Best Management Practices for erosion control have been given further consideration in Chapter J. Specific recommendations for erosion control are contained in Chapters D, H and I.
- 5.B. Draft Plan/EIS provided requested information, see Section 8.0 of Chapter C. Also, see response to 2.C. above.
- 5.C.1 This comment is a correct assessment. There are some nutrients coming from livestock, but no controls are suggested at this time because other more superior measures are recommended. However, it is indicated in several places in Chapter D that agricultural-source controls may be needed in the future.

- 5.C.2 This comment appears to be a value judgement. Only the most cost-effective measures with demonstratable benefits were recommended. Controlling construction practices has a cost-effectiveness inferior to several other measures.
- 5.C.3 The septic system management program in Chapter F has been substantially expanded.
- 5.C.4 Table C-4 is meant as a review of land use controls pertinent to water quality, not as a list of land use controls which all communities must have. This has been clarified in the Table. Land use guidelines and control measures pertinent to lakes have been developed and are part of the recommended management program.. (See Chapter D, Section 17.0(2), and Table D-15).
- 5.C.5 This institutional question is reviewed in Section 24.1 of Chapter D and in the expanded Chapter K (Section 8.4). In terms of specific institutional lake management mechanisms, they should be allowed to evolve at the local level, if they are to be locally accepted. The management structure will vary, depending largely upon the measures followed for each lake.
- 5.D.1 Recommendations for site specific studies have been clarified in Section 5.0 of Chapter E.
- 5.D.2 PCB threat to groundwater was noted in Draft Plan/EIS; see Section 4.0 of Chapter E.
- 5.D.3 Same response as 4.D. above.
- 5.E. Comments have been addressed in Chapter J.
- 5.F. Target date of 1983 for "fishable-swimmable" water is assumed to apply.
- 6. Changes have been made in Chapter I regarding Best Management Practices; management agencies are addressed in Section 7.0 of Chapter I.
- 7.A.1 Management agencies for regulatory programs are discussed in Section 2.0 of Chapter K.
- 7.A.2 Existing water quality management system is discussed in Section 2.0 of Chapter K.
- 7.A.3 Potential management agencies are discussed in Section 2.0 of Chapter K.
- 7.A.4 Cost adjustments have been made throughout the report.
- 7.A.5 Separate listing of state/federal funding policy recommendations is provided in Section 6.2 of Chapter K.
- 7.B. Recommendations for changes in water quality standards were initially transmitted to the Division of Water Pollution Control in May, 1976.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
AREA OFFICE  
BULFINCH BUILDING, 15 NEW CHARDON STREET  
BOSTON, MASSACHUSETTS 02114

John F. Kennedy Federal Building  
Boston, Massachusetts 02203

APR 18 1978

IN REPLY REFER TO:

1.1SE

William R. Adams, Jr., Regional Administrator  
U.S. Environmental Protection Agency  
Environmental and Economic Impact Office  
J.F.K. Federal Building, Rm 2003  
Boston, Massachusetts 02203

RECEIVED

APR 20 1978

BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION

Attn: Robert E. Mendoza

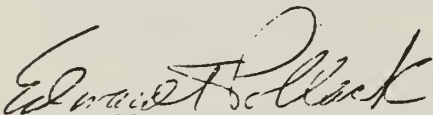
Dear Mr. Adams:

The Draft EIS for the Berkshire County Regional Planning Commission Section 208 Water Quality Management Plan has been reviewed by the Boston Area Office of HUD.

This agency concurs that a water management plan for all of the communities in this Region will result in preserving not only the quality of the ground and surface waters, but also the future sources of water for the area.

In reviewing the DEIS this office finds no conflicts with HUD objectives.

Thank you for the opportunity to review and comment on the Section 208 Plan for the BCRPC.

  
Acting Area Office Director

DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION

NEW ENGLAND REGION  
12 NEW ENGLAND EXECUTIVE PARK  
BURLINGTON, MASS. 01803  
Tele: (617) 273-7321



208  
APR 12 1978

Mr. William L. Kormanik, Chairman  
Berkshire County Regional Planning  
Commission  
10 Fenn Street  
Pittsfield, MA 02102

RECEIVED

APR 18 1978

BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION

Dear Mr. Kormanik:

We have reviewed the Water Quality Management Plan for the Upper Housatonic River Draft Plan/Environmental Impact Statement, December 1977, and are concerned with the indirect effect of the extension of sewer service west of the Pittsfield Airport.

While a decline of population is indicated, its redistribution is not precluded. Extension of sewer service west of the Pittsfield Airport could encourage residential development incompatible with airport operation. The Draft Plan discusses land-use but does not specify a particular use for this area. Proper zoning prior to completion of this project to prevent incompatible land use near the airport is strongly recommended.

Thank you for the opportunity to assess the effect of the Draft Plan on aviation interests.

Sincerely,

A handwritten signature in cursive script that reads "Raymond W. Stone".

RAYMOND W. STONE  
Chief, Planning and Appraisal Staff

RESPONSE:

Sewer service west of the Pittsfield Airport was constructed in the mid-1960's. However, we share your concern for potential residential development which would be incompatible with airport operation, and believe your comments are well taken. Also, this area has been under study by the Pittsfield Planning Board.

208

UNITED STATES DEPARTMENT OF AGRICULTURE  
FOREST SERVICE  
NORTHEASTERN AREA, STATE AND PRIVATE FORESTRY  
P.O. AND FEDERAL BLDG., 80 DANIEL STREET  
PORTSMOUTH, N.H. 03801  
(603) 436-7720 Ext. 765

3580  
May 23, 1978

RECEIVED



Berkshire County Regional Planning  
Commission  
10 Fenn Street  
Pittsfield, Massachusetts 01201

MAY 24 1978

BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION

Gentlemen:

I wish to comment on two aspects of your Water Quality Management Plan for the Upper Housatonic River Draft Plan/Environmental Impact Statement.

First, the plan cites tree leaves as being a non-point pollution problem. Leaves would be a problem where they accumulate on paved or other impermeable surfaces. Within natural forest areas, leaf litter would be incorporated in the soil humus and improve or maintain infiltration of water into the soil.

Second, your Land Use Guidelines would discourage silviculture on slopes greater than 15 percent. This finding is not consistent with National Standards for Best Management Practices for Silviculture. Also, the Guidelines for Silviculture are quite different than those for construction activities. I would not lump the two together.

I would suggest that you work more closely with the Massachusetts State Forester, particularly since it appears your Guidelines will adversely affect the management and use of state forest lands.

Sincerely,

KENNETH J. JOHNSON  
Field Representative  
Area Planning Staff

RESPONSE

Leaf control is suggested only next to the lakeshore, not in the whole watershed. Where leaves could fall directly into the lake from adjoining trees, which is our concern, we are only suggesting that where trees are wanted, those with less-frequent leaf-drop (such as evergreens) be utilized.

The 15 percent slope guideline is meant to indicate a potential problem area, which should be avoided if possible and, if not, that a special review and appropriate steps be made to reduce erosion and nutrient release.

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

29 Cottage Street, P.O. Box 848, Amherst, Massachusetts 01002

**RECEIVED** March 1, 1978

Mr. Karl Hekler  
Director  
Berkshire County Regional  
Planning Commission  
10 Fenn Street  
Pittsfield, Massachusetts 01201

MAR 3 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

Dear Mr. Hekler:

Subject: INTERA - Water Quality Management Plan for the Upper Housatonic  
River Draft Plan

We have reviewed the Draft Water Quality Management Plan for the Upper Housatonic River and commend you on its high quality. The analysis behind the Lake Eutrophication Control proposals is well presented and supports your conclusions.

The following minor comments are offered for your consideration:

1. Page D-23, line 13 - change "Muskie" to "Musgrave";
2. Page D-23, line 14 - change "SCS, Wishmeier" to "ARS, Wishmeier."  
Dr. Wishmeier was an Agricultural Research Service employee.
3. Page D-23, line 16 - change "conducted by SCS" to "computed by  
SCS from USGS measurements";
4. Page D-38, line 22 - change "measured independently by SCS" to  
"computed by SCS from USGS measurements."

Sincerely,

*Philip Christensen*  
Philip Christensen  
Chairman  
USDA 208 Committee

cc:  
Ronald Thompson

RESPONSE:

Corrections have been made as recommended.





# United States Department of the Interior

OFFICE OF THE SECRETARY  
Northeast Region  
15 State Street  
Boston, Massachusetts 02109

MAY 25 1978

ER-78/238

May 22, 1978

Mr. William R. Adams, Jr.  
Regional Administrator  
U.S. Environmental Protection Agency,  
Region I  
J. F. Kennedy Federal Building, Room 2003  
Boston, Massachusetts 02203

Dear Mr. Adams:

This is in response to your request for comments on the draft environmental statement and draft Section 208 Water Quality Management Plan for the Upper Housatonic River, Berkshire County, Massachusetts, prepared by the Berkshire County Regional Planning Commission.

## GENERAL COMMENTS

The study makes positive strides toward achieving the mandates of the 208 program but falls somewhat short of reaching the final goal.

The study does not establish a schedule of priorities. Although certain programs receive greater emphasis than others, the final statement should include a clear outline for carrying out the plan recommendations. Incorporated in this outline should be the name of agencies presently in existence or soon to be formed, which will regulate and manage the different programs.

The plan relies upon local communities to carefully zone and regulate construction practices in floodplains and lake basins. Such regulation has been inadequate in the past in protecting water quality. Greater emphasis should be given to setting zoning standards in these critical areas. Construction should be managed through local by-laws designed to reduce runoff and stream-bank erosion.



All of the plan recommendations will require public support to be effective. An education program should be designed to inform the public of their role in improving the water quality of the Upper Housatonic River Basin.

### Fish and Wildlife

The study does not mention the lake and river fishery and the wildlife using the river basin. This information should be incorporated into the report along with a discussion of how the recommendations and alternatives will impact on these natural resources, both positively and negatively. This is especially important for consideration of the Woods Pond alternative.

### Wetlands

Wetlands play a significant role in maintaining water quality as well as providing habitat, aesthetic values, floodplain protection, and low-flow augmentation. ~~Across the country, new facilities are being designed, using wetlands for tertiary treatment.~~ This report remains vague in its treatment of wetlands. In view of their significance for water quality protection, the study should be expanded to include a section dealing with wetlands.

### Surface-water resources

Agriculture accounts for a significant input of nutrients and coliform to the river system through the use of fertilizers and from runoff of manure in livestock feeding areas. The statement reviews alternatives for reducing this input in a very cursory manner. The Soil Conservation Service has promulgated recommendations for agricultural management which have been found to be cost effective in reducing loss of topsoil and fertilizer. These practices should be reviewed and efforts made to support them. More studies are needed to determine where significant levels of nutrients and coliform are coming from livestock areas. Even if this input is only storm related it is significant enough to require management.

The study has found phosphorus to be a limiting factor in the eutrophication of most area lakes. Its reduction should significantly improve area water quality. A major source of this nutrient is from detergents used for cleaning clothing

and dishes. Several states including New York and Minnesota have enacted legislation limiting the sale of detergents containing high phosphate concentrations. This has resulted in a significant reduction of phosphates in their systems. This alternative should be examined as a potential means of attacking the phosphorus problem.

#### Ground-water resources

The Crane and Company location is suggested as one of the preferred sites for low-flow augmentation (p. G-5, G-20, G-21). The company would pump 6 cfs of water from its wells tapping limestone aquifers and discharge it to the river. If data are available to indicate that the limestone aquifers are hydraulically completely isolated from the river and from the overlying shallow aquifers, this information should be discussed. Otherwise, the final statement should indicate whether the discharge from the wells will be monitored to assure that no distant or delayed hydraulic connection between the cavernous limestone aquifers and the river becomes effective during the heavy pumping and that no recirculation will occur.

Table E-6, a matrix showing the assessment of ground-water pollution threats, does not evaluate industrial activity as one of the possible sources, although elsewhere in the document the presence of PCB's has been traced to the General Electric Co. plant (p. J-15). Perhaps, as suggested on page F-24, industries have controlled or will control contaminants so efficiently that no threat will exist; however, it appears that the matrix should present an evaluation as carefully considered as that for every other potential source of pollutants.

#### Mineral resources

Berkshire County is one of the leading mineral producing counties in the State, producing sand and gravel, stone, and lime. According to recent records, there are 4 stone producers and 11 sand and gravel operations within the study area, many of which lie within designated recharge areas. Table E-8 indicates that mining should be limited to above water table areas and mining activities should be located away from recharge areas. The very nature of sand and gravel deposits often requires extraction in recharge areas. The restrictions listed in table E-8 could severely limit the mining of aggregate materials in the county.

The plan and statement are not adequate with regard to mineral resources and operations. A plan which deals with development in an area over a 20-year period should discuss the impact of restricting the mining of aggregates; this plan does not discuss such impacts. Section 6 (especially 6.3 of chapter E and sections 6.2, 6.4, and 6.6 of chapter K should be modified to discuss the impacts of the proposed plan on mineral resources and operations.

#### Cultural resources

Chapter K, Section 6.0, would benefit from an expanded treatment. Only brief mention is made of impacts on historical and archeological sites. WE feel that this environmental statement should encompass, commensurate with other environmental aspects considered, a more detailed discussion of the probable existence of historical and archeological resources to be affected through physical implementation of the proposed plan. Further, there should be a discussion of a systematic approach toward cultural resource preservation in line with the procedures found in 36 CFR Parts 63, 66, and 800 for the awareness and guidance of decision makers on this present planning action and for guidance in deciding upon physical actions to implement the plan in future years.

At this point, we feel it is the Environmental Protection Agency's duty to exhibit its concern and responsibility for cultural resources preservation as a part of any further support for the plan.

#### SPECIFIC COMMENTS

##### Specific comments on environmental impact statement

Page A-1, par. 3. The rationale behind the last sentence in this paragraph is unclear. The statement should either be followed by a paragraph elucidating this point or the words "even greater" should be replaced by "significant."

Page C-12, par. 7. Chlorination is not the only answer for reduction of coliform levels. Efforts should be made to attack the sources of the problem, for example by storm sewer management, and to provide sediment basins down-slope from livestock areas.

Page C-13, par. 2. The sentence "These buffers appear to be useful ..." should be expanded to read "in most rural and urban areas."

Page C-13, par. 3. Wetlands play a significant role in water quality management. They are our natural filtration system, trapping nutrients and sediments received from area runoff. Those nutrients that are not taken up in the system are discharged at reduced rates rather than peaked flushes which result in algal blooms. This paragraph should be altered to indicate the importance of wetlands. The Ottormark study is only one of many which have been done on wetlands, the majority of which expound upon the water quality benefits provided by wetlands.

Page C-13, par. 4. Floodplain management has a significant direct impact on water quality. Construction in floodplains creates impermeable areas, increasing surface runoff and stream bank erosion. Utilization of cars, road salts, fertilizers and pesticides add to the pollutants entering the system. This problem deserves closer study.

Page D-49, #12. What institutional reasons exist which do not allow recommendations to be made for agricultural management? These reasons should be documented since agriculture is an important contributor of pollutants.

Page D-49, #13. It is not clear why construction practices are not cost effective.

Page G-8, 6(b). This alternative should receive further investigation. On-land disposal has been used in other areas such as Muskegon, Michigan, with positive results. Although local terrain may make it less feasible for a plant with the capacity of the Pittsfield facility, it should be studied as a possible solution to this problem for area plants having smaller capacities.

Page G-14, #5. The second sentence in this paragraph should discuss Alternative A, and not B.

Page J-9, par. 2. The report does not indicate where sufficient information was collected enabling the determination that coliform from livestock is less significant than coliform from humans. This information should be provided in the report.

Page J-13, par. 3. Although these figures are interesting, they say little about the significance of the problem and what steps can be taken to control it.

Page J-17, Table J-8. Erosion-related sources and livestock were two of the largest non-point contributors of pollution to Woods Pond, exceeding septic systems, and yet they appear not to be considered significant enough to draw recommendations. This is an important area in which the plan is lacking.

Page K-13, par. 1. The cold-water fishery remains in the Housatonic throughout the year; therefore, to change the river classification to "seasonal cold-water fishery" would be inaccurate. Perhaps temperature criteria could be established with seasonal rather than yearly ranges.

Page 1-1, 2(3). Chlorination is not the only solution to these problems.

#### Specific comments on the Supplement

Page 3, par. 1. It is our understanding that relevant Federal law requires that industry meet the 1983 discharge standards. Costs are one factor influencing at what level these standards are set, but it is only one factor. The Federal Water Pollution Control Act was enacted to restore and protect

the nation's water quality and those vairable resources associated with it. At the time the law was established, Congress was aware that such efforts would be costly, but the determination was made that the long-range benefits would more than compensate for the costs. The statement appears to recommend a deviation from this mandate, one based solely on cost. If such a recommendation is permissible under the law then a much fuller explanation of its basis and validity appears to be obligatory. The current discussion is superficial at best.

Page 15, par. 4. The report states that the Lee Sewage Treatment Plant at present conditions will be reaching capacity in seven years. The extension of the sewer system to new areas will offset the reduction in flow achieved by repairing leaks in the sewer lines. Therefore, studies should be initiated to plan for increasing the capacity of the facility.

Page 26, Sewage Treatment. The Pittsfield Sewage Treatment Plant is a significant contributor of nutrients to the Housatonic River. Therefore, major alterations of the facility can be environmentally and economically significant. Movement of the plant's discharge downstream of Woods Pond will greatly affect the pond and the river, thus affecting the biota of the area.

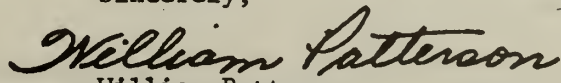
The study does not show sufficient data available, other than cost figures, on which to base such an important recommendation. Before this recommendation is accepted the following should be studied:

- (1) Effects on fish and wildlife in the pond if the discharge is moved downstream.
- (2) Effects on fish and wildlife in the river where the pipe would be diverted.
- (3) What, if any, treatment will occur in a four-mile pipe.
- (4) Environmental comparison between adding nutrient removal at the plant and moving the discharge downstream.

Page 28, par. 4. Same comments as on Page 3, par. 1, above.

Thank you for the opportunity to comment on the draft environmental statement and Water Quality Management Plan with Supplement.

Sincerely,

  
William Patterson  
Regional Environmental Officer

## SOURCE OF COMMENTS

U. S. Department of the Interior  
Office of the Secretary, William Patterson

RESPONSE - Sections are the same as in the review comment letter

### General Comments:

Schedules and priorities have been given more attention in the Final Plan/EIS. The initial implementation program, including public participation, is outlined in Chapter K, Section 8.0.

The BCRPC agrees with the objective of this comment; for this reason it has set zoning and development standards for selected critical areas, and recommends improved construction standards for large projects. (See Section 6.4 of Chapter I).

### Fish and Wildlife:

Native fish and other aquatic life were considered in development of recommended water quality standards. See Appendix 1.

### Wetlands:

Several types of wetlands are recommended for protection in the report, including lakes, tributaries, groundwater and so on. "Non-critical" area wetlands were reviewed and a summary of that review is on page C-13. Although they have a relationship to water quality, the BCRPC feels it is so indirect as to not justify strong universal regulatory constraints beyond the Wetlands Protection Act presently in force in Massachusetts. For example, wetlands are believed to be neither nutrient sinks or sources when viewed over an annual cycle. Nonetheless, the example in Table C-5 shows that wetland protection measures are incorporated on a case-by-case basis when appropriate.

### Surface Water Resources:

As noted in the comment, more studies are needed to determine where significant levels of nutrients and coliform are coming from livestock areas. The real-world water quality data base for nonpoint sources should be greatly expanded before extensive agricultural management practices are implemented.

We have recommended "use of non-phosphate detergents" for numerous lakes. A statewide ban was considered, but was not selected as the best approach. (See measure (4) of Section 15.1, Chapter D).

### Groundwater Resources:

Low flow augmentation is not part of the recommended river management strategy. Groundwater pollution threats from various types of industrial activity are discussed in Table E-8.

Page D-49, #13 - A cost-effectiveness analysis of various measures is provided in Table D-14, which shows that controlling construction practices is not as cost-effective as several other measures.

Page G-8, #6 (b) - This option for the Pittsfield sewage treatment plant was rejected primarily on the basis of poor cost-effectiveness and potential adverse environmental impacts from construction of necessary effluent storage facilities. For smaller plants, no additional facilities construction is recommended.

Page G-14, #5 - This correction has been made.

Page J-9, Para 2 - Water quality data from previous studies was used as well as data collected during the planning program.

Page J-13, Para 3 - Control measures are discussed in Section 12.0 of the Chapter.

Page J-17, Table J-8 - Recommendations are provided in Section 12.3 of the Chapter.

Page K-13, Para 1 - More information on water quality standards is provided in Appendix 1 of the report.

Page 1-1, 2 (3) - Coliform control is more fully discussed in Chapter H, I and J.

#### Specific Comments on the Supplement

The supplement was intended as a public informational document which briefly presents the plan's recommendations for each municipality. To summarize the voluminous technical material of the full report, some degree of simplification was necessary. Therefore, the supplement does not contain the full rationale and justification for each of the plan's recommendations, which can be found within the full report.

## Mineral Resources:

Mining is listed as a potential groundwater pollution threat because abandoned sand and gravel pits may be used as informal solid waste disposal sites. As noted in Section 5.2 of Chapter E, the protection strategies listed in Table E-8 should be considered in relation to the priority of the aquifer and the severity of the potential threat, using Table E-6 as a guide. Thus, restrictions on mining activities are not expected to be severe or widespread; impact of the plan on mining of aggregates should be minimal.

## Cultural Resources:

The most significant construction-oriented aspects of the 208 plan are those related to wastewater treatment facilities and recommended sewer extensions. EPA regulations under the 201 construction grant program provide for project-level environmental assessments, including historical and archeological surveys.

As a further step toward cultural resource preservation, future 201 grants must be consistent with the 208 plan and reviewed by the 208 agency. All potential impacts noted in Section 6.0 of Chapter K, including historical and archeological impacts, will be considered in the 201 grant review for 208 plan consistency.

## Specific Comments

Page A-1, Para 3 - The words "even greater" refer to the fact that state/federal regulatory programs would not mandate lake eutrophication control or groundwater protection, yet these programs are included in the recommendations of the 208 plan.

Page C-12, Para 7 - Alternatives such as storm drainage treatment were investigated and found to be of limited benefit and relatively expensive. The sources of the coliform go well beyond livestock, and downslope sediment basins thereto would resolve only a small portion of the problem.

Page C-13, Para 2 - Addition made.

Page C-13, Para 3 and Para 4 - We agree that wetlands and floodplains can be shown to have a relationship to water quality. However, we believe it is not a commanding enough relationship to dictate the establishment of development standards for these areas based on water quality considerations, per se. Instead, the management of these areas is more properly pursued through flood control and habitat preservation objectives. Moreover, wetlands and floodplains are well regulated in the area through the state Wetlands Protection Act and local zoning bylaws.

Page D-49, #12 - A clarification of "institutional reasons" has been made in the text.

## STATE



DAVID STANDLEY  
COMMISSIONER

# *The Commonwealth of Massachusetts*

*Executive Office of Environmental Affairs  
Department of Environmental Quality Engineering*

*100 Cambridge Street, Boston 02202*

**RECEIVED**

MAY 26 1978

May 22, 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

Mr. Rick Holmes  
Berkshire County Regional  
Planning Commission  
10 Fenn Street  
Pittsfield, Massachusetts 01201

DEQE Synthesis: Draft Plan

Dear Rick:

The following state agencies have submitted comments on BCRPC Draft Water Quality Management Plan and these comments are attached for your information:

|      |              |
|------|--------------|
| DEQE | DWPC         |
| DCA  | Water Supply |

No comments were received from any of the other state agencies on the draft plan distribution list.

In reviewing the comments submitted to us, no major conflicts were noted between any of the agencies. \* Therefore, this synthesis is intended to act as a summary of the major points contained within the comments which may require further action if individual plan elements are to receive full certification.

The following points were raised and should be considered in the development of the final plan:

- 1) DWPC's concern regarding the lack of back-up information to justify not meeting certain federal and state goals and standards is certainly justified. While the plan recognizes that there are a number of problems, (social, economic, and environmental) in meeting the 1983 goals of PL 92-500 and the states water quality standards, the recommendations seem to consistently favor least-cost alternatives with little documentation of the subsequent impacts. This fact has already been noted in EOE's comments on the draft EIR. For example, on page 3 of that statement it is noted that "the full range of environmental impacts from proposals for low-flow augmentation of the Hoosatic

\*The DWPC does differ slightly from DCA when it recommends the use of subdivision regulations as a tool to reduce runoff (DWPC comment #26.) DCA points out that if planning boards wish to amend subdivision regulations, the changes should be based on considerations of safety and adequate access, as opposed to being based solely on considerations of environmental soundness. DCA recommends that runoff control standards be inserted as part of a special permit process to the zoning by-law.

River must await more detailed future study." The statement recognizes the fact that the 208 process offers the designated planning agency the option of developing a plan based either on compliance with standards or on a "realistic evaluation of costs and benefits." While your plan clearly follows the latter course, it does not always attempt to measure the impacts of this approach in a comprehensive fashion. DWPC comments 5,6,7,8,9,and 11 should all be carefully considered in this light.

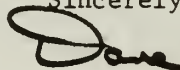
- 2) I am assuming that your recommendations regarding the Stockbridge 201 plan will be modified based on the additional information you indicated you received from the town.
- 3) While the DWPC is correct in noting that seasonal population projections have not been verified as requested (#13), the impact of any potential variances to actual figures are unlikely to create any major problems for 201. Therefore, this lack of verification should not cause any problems with regard to certification.
- 4) Chapter B-4.2 - fails to note the costs of instituting a septic system management and disposal program at either the areawide or town level.
- 5) Chapter D should break out the costs of lakes management programs on a town-by-town basis rather than areawide (table D-16). Methods of financing are also unclear.
- 6) Chapter E should also attempt to estimate the costs of implementation on a town-by-town basis since Chap. E-6.2 indicates that these costs will be a totally local expense.
- 7) A footnote in Chap. K, K-15 contends that state funds can be used for the purpose of providing matching funds for areawide planning agencies. This statement is incorrect. The Commonwealth is providing the 25% match for 208 planning in "non-designated" areas because the Commonwealth has been designated as the lead planning agency in those areas. If the Commonwealth is designated as the continuing 208 planning agency for Berkshire County it will be required by law to match future federal funding. If BCRPC is designated as the continuing 208 planning agency for Berkshire County, it will likewise be required to match federal funding.
- 8) Both DCA and DWPC have raised an extremely valid point regarding the overall financing of actions required at the local level. The draft plan recommendations are based on the assumption that the costs of local administrative action can be matched by either the state or federal government on a 75%-25% basis. While this would obviously be desirable at the local level, current 208 regulations require that such actions be supported entirely at the local level. Therefore, the final plan should indicate that until the regulations change, towns should be prepared to carry the total financial burden of this element of the plan.

Page 3.  
Rick Holmes  
May 22, 1978

Furthermore, the socio-economic impacts of local financing should be clearly described.

Finally, it appears that the chances of the BCRPC 208 plan being implemented are highly dependent on local acceptance of the plan. Any certification recommendations on the part of the Commonwealth will depend in large part on the results of the Final 208 Plan Review Questionnaire to be completed by the chief local elected officials at the end of the 30 day review period. Therefore, I urge you to do whatever you can to assist each community in the completion of the questionnaire.

Sincerely,



David Terry

DT/lrs

CC: Bill Nuzzo, EPA  
Barry Jordan, EPA  
Dick Young, DWPC  
David Dronsick, DCA  
Paul Watson, Water Supply

Attachments



DAVID STANDLEY  
COMMISSIONER

# *The Commonwealth of Massachusetts*

## *Executive Office of Environmental Affairs Department of Environmental Quality Engineering 100 Cambridge Street, Boston 02202*

### MEMORANDUM

TO: Dave Terry  
FROM: Alan Van Arsdale  
DATE: May 15, 1978  
SUBJECT: Lake Water Quality Management Section-  
WQMP for the Upper Housatonic River

I do not have any major problems with the LWQM section of the Draft Plan of WQM developed by the BCRPC. There are the usual minor technical and typo errors, which in this case do not significantly detract from the substance, quality, or emphasis of the section. I would, however, like to comment on few points which should be brought forward. These comments concern nitrogen limitation in lakes, substituting coniferous trees for deciduous trees, and sewerage entire, or portions of lake watersheds.

Sewerage. There is some concern expressed in the document over the potential long term effects of sewerage entire or portions of lake watersheds. This is a good assessment. However I do not feel that statements in the document are sufficiently strong to promote necessary caution. Efforts to reduce current health problems or to eliminate sources of nutrient loading to the lake by sewerage may increase the probability of causing future pollution problems which are less susceptible to abatement efforts. It is therefore important to identify potential problems and methods of minimizing or eliminating these problems. I propose that information on the effects of development resulting from sewerage on the water quality of lakes be gathered. The information should be used to develop guidelines which could be used in watersheds where sewerage has been recommended.

Biological substitution. Substituting coniferous trees for deciduous trees along shoreland areas of lakes in order to reduce nutrient loading and/or the build-up of sediment which supports macrophyte growth is not appropriate. Cultural sources of pollution should be abated first. Natural sources of nutrients should be addressed as a last resort, especially if major habitat perturbations are anticipated.

Nitrogen Limitation. The question of nitrogen limitation in lakes is still one which is not yet completely answerable. It does appear, however, that in the absence of competing macrophytes, nitrogen fixing bluegreen algae are selected for when nitrogen concentrations are depressed more than phosphorous concentrations. The promotion of nitrogen fixing bluegreen algae may not, however, be a serious problem in the lakes under consideration because a) macrophytes

Page 2.  
Dave Terry  
May 15, 1978

may be sufficiently abundant to competitively reduce algal productions, and  
b) phosphorous loading to the lakes will be reduced more than nitrogen loading.

ls

RESPONSE:

Sewering:

We agree that information on the effects of development resulting from sewerage on the water quality of lakes be gathered. However, it is beyond the level of specificity and resources of the 208 planning. We suggest that the most appropriate means for obtaining this data would be at the 201 facilities planning level, and its environmental impact statement.

Biological Substitution:

(The term "biological substitution", as used in the report, applies to the lake weeds, not the nearby trees; "Leaf Control" is the apparent subject of this comment).

This comment appears to be a value judgement and there is no clear explanation as to why leaf control is "not appropriate". The BCRPC has recommended a package of measures for each lake which are oriented toward reducing the inflow or impact of nutrients in the most cost-effective manner, regardless of their source. No "major habitat perturbations are anticipated" as a result of this measure. In any case, there is no clear distinction between "cultural" and "natural" sources of nutrients as this comment seems to indicate - if a person decides to plant a maple tree along a lake and its leaves fall in the lake is this a natural or cultural source? Our leaf control recommendation would merely prefer to see an evergreen planted instead of a deciduous tree.

Nitrogen Limitation:

We agree that the promotion of nitrogen fixing blue-green algae may not be a serious problem, and we note that we have consistently recommended professional involvement in the lake management program which would be alert to this potential problem.

MEMORANDUM

May 15, 1978

TO: David Standley, Commissioner  
Department of Environmental Quality Engineering

FROM: Thomas C. Mahan, Director  
Division of Water Pollution Control

SUBJECT: REVIEW OF DRAFT BERKSHIRE COUNTY 208 REPORT

Division staff have reviewed the Draft Environmental Impact Statement and Proposed 208 Water Quality Management Plan for the Upper Housatonic River Basin, dated December 1977.

In general, the report represents a commendable effort on the part of the agency. The report contains a good overview of the diversity of issues which make up the water quality management puzzle. Readers will obtain a good feel for what needs to be done.

Our focus, of course, is unique as the State agency most directly involved with the subject and our review therefore more detail oriented. From this point of view too little backup material has been made available to us to be able to validate specific data set forth in the report. Costs in general seem to be based on national averages which may or may not reflect Berkshire County costs.

More serious however is the lack of back up information to justify not meeting the 1983 national goal of FL92-500.

Other specific comments are as follows:

1. All costs should be recalculated and shown on the basis of current funding eligibility criteria.
2. Continued discharge of untreated combined sewer overflows by Great Barrington is not in accordance with State and Federal enforcement programs.
3. The plan should recommend implementation of the I/I report findings, not another study in Great Barrington.
4. Stockbridge sewer recommendations must be brought into conformity with the state and federal enforcement program.

5. The Plan recommends non-compliance with the 1983 goals of the Act. Supporting data to evaluate such a recommendation is not apparent. The financial, social, and environmental impacts of complying with the Act should be clearly stated and quantified before the Plan is endorsed.
6. It appears that the municipal and industrial treatment considerations are based on the present stream classifications and conditions, not the 1983 goals which have been historically linked with Class B requirements.

Since the State's Water Quality Standards are presently being revised and the C classification of the river will be upgraded to B in accordance with the 1983 goals, it is quite possible that more segments will become "Water Quality Limited." This will be addressed in the Phase II Water Quality Management Plan for the Basin and therefore a broad statement rejecting the 1983 limits should be withheld until the exact effluent limits are determined.

7. It is a national goal to have, wherever attainable by 1983, a "water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water" (PL92-500). The "208" and "303(e)" Water Quality Management Plans therefore, were designed to address all existing and potential sources of water pollution on the basis of what must be done to achieve this national goal. The plan fails to accomplish this in regards to control of phosphorus in the discharges to the Housatonic River.

The "205" plan suggests that phosphorus removal at the Pittsfield STP would be costly and would have questionable results since non point sources would still exist. Because of the uncertainties regarding the effects of phosphorus removal, the plan recommends that a permanent phosphorus removal facility not be built unless and until it can be demonstrated that phosphorus removal can make a significant reduction in eutrophication. Various removal alternatives and the costs comparisons should be included to defend this recommendation.

8. Since it has been determined that a minimum concentration of dissolved oxygen of 5.0 mg/l is necessary to maintain indigenous fish populations the Division of Water Pollution Control has adopted this minimum allowable value for design purposes. The Phase II basin plans, which will address the steps necessary to achieve the 1983 goals, will be based upon revised water quality standards (which will reflect this 5 mg/l minimum). Although these new standards are not final and cannot be used at this time for planning purposes, the present Class B criteria is generally accepted as "fishable/swimmable" quality. For the sake of consistency, the "208" plan should likewise use this value.

May 15, 1978

page 3

The RCRPC plan, however, uses Class B1 criteria: that is dissolved oxygen not less than 5 mg/l during at least 16 hours of any 24 hour period, not less than 3 mg/l at any time. Generally the plan sets the goal of achieving 5 mg/l at all times, however, in some cases they allow various alternatives to depress the D.O. below 5 mg/l with the justification that under the current State Standards, D.O. can drop below 5 mg/l to 3 mg/l for a period of 3 hours in a given 24-hour period. When costs comparisons are made the alternatives which allow certain violations in the 5 mg/l criteria cause a biased analyses. This may become especially important in determining which option, storage/augmentation or piping below Woods Pond should be selected if phosphorus removal is required at the Wicwasic WWTP.

The plan recommends that the Commonwealth rewrite the Water Quality Standards to relax its coliform standards during storms while keeping the emphasis on controlling coliform during normal periods.

The State's Water Quality Standards (as mentioned above) are presently being revised. These revisions are expected to include a coliform bacteria limit as the waters will be required to provide for the protection and propagation of fish, shellfish, aquatic life and wildlife as well as primary contact recreation. To allow violations in the coliform criteria would not only require a change in the Water Quality Standards but a degrading of the designated uses as well. The solution therefore, is not a clear cut change in the standards, but as I see it, a two fold process. First, a change in the standards to allow variations in use designation and second, an exemption from the National Goal to allow temporary degradation of the designated uses.

The problem then becomes one of proving that maintaining the national water quality goal uses is not attainable. Presently, this can only be done by proving the use cannot be attained because the imposition of controls above or in addition to the technology - based requirements of Best Available Technology Economically Achievable and Best Practicable Wastewater Treatment Technology would be required and would result in a substantial and widespread adverse economic and social impact.

10. The Lake Water Quality Management Section appears to adequately address all possible restorative and/or preservative measures for study lakes in the region. The formulation and implementation of practical land use management practices (long-term measure), coupled with mechanical harvesting of undesirable aquatic plants (short-term measure) in selected sections of some lakes appears to be a most realistic approach towards restoring the recreational quality of some of the waterbodies. The ecological implications arising from the substitution of Chara in place of other so-called "nuisance" aquatic plants should be further investigated, possibly through laboratory and small scale field experiments.

11. Recommended control programs for the region's non-point problems are generally geared toward the least cost alternative rather than the most cost effective solution. A more complete discussion of the various feasible strategies and the associated costs should be included in the report.

The use of "good housekeeping" practices and programs as suggested may prove to be the most cost effective, however, to prove this, more has to be done than simply state that other alternatives are very expensive compared to the benefits gained. One example is the recommendation to accept violations of coliform standards based on the fact the area's residents are willing to sacrifice swimming in the river during and immediately after storm events.

Violations of the coliform standards not only renders the waters unswimmable, but since coliform are an indicator organism, might also have an adverse affect on aquatic organisms (Effects of Sewage Treatment Plant Effluents on Fish, Chesapeake Research Consortium Incorporated) thus affect its fishability as well. A valid cost effective comparison in this case can only be made if all such environmental effects are considered.

12. Permanent population projections appear reasonable, if concurred with by local agencies.
13. Seasonal population projections have not been verified as requested. Until they are verified, the numbers can not be accepted in a limiting sense.
14. The potential problems of conversion of seasonal quarters has not been addressed, as requested.
15. While growth in land use is tabulated, it has not been mapped geographically as requested. This prevents meaningful review of service areas, adequacy of protective mechanisms, etc.
16. Two alternative growth patterns were to have been examined; one, the result of no regulatory changes, the second assuming growth would be prevented in environmentally critical areas. If this was done, what are the differences between the costs of the various elements of the problem?
17. While the portrayal of critical areas has been improved by the pocket map, it is obviously erroneous to conclude that all critical areas are shown. If slopes greater than 15% are critical to the selected lakes, are they less critical to other waters. Are the drinking water recharge areas the only critical wetlands?

MEMORANDUM

May 15, 1978

page 5

18. While the tabulation of land use controls presented in Table C-4 is a worthy addition, the requested data on budgets, staffing and programs is not provided.
19. Chapter D is in many respects the best of the report, however it falls short of being implementable since the agency to be responsible is not identified. This leaves unanswered the questions, do they have legal authority, money or willingness? Costs are not stated clearly enough for an assessment of implementability to be made. Methods of financing appear to have received little thought other than grants.
20. Chapter E appears to be a good start but costs and institutional impacts are not clearly set forth.
21. Land Use Guidelines (Table E-7) should call for rerouting roadway drainage to surface waters downstream of the water supply intake or lake.
22. While the showing of interceptors on the pocket map complies with our previous requests, the level of study and justification possible in this report do not allow acceptance in a final or limiting sense.
23. On the sewer service area delineations maps it is not possible to differentiate whether the area has been based on a 201 study, the previous regional plan or data generated by this study. There is also no way of identifying whether the 1990-2000 areas represent a phasing of current needs or new growth. For these reasons, the areas, flows, etc. cannot be accepted in a limiting sense.
24. The septage disposal section falls far short of an adequate management plan.
25. The analysis presented in Chapter I is too weak to be accepted with finality. The recommended program can be considered as a minimum until further study is conducted. The theoretical nature of the estimated reductions makes them unacceptable for permit purposes.
26. For urban areas other than Pittsfield, thought should be given to modifying subdivision design regulations pertaining to grading to reduce runoff.

MEMORANDUM

May 15, 1978

Page 6

27. As noted in previous reviews the legal, financial, institutional aspects of this study are weak. There is insufficient data on budgets, staffing, program outlooks and other management data needed to evaluate the appropriateness of agency designations. For example, what will be the impact on municipal tax rates, or on the homeowner? Can they afford it? Do lake associations have any permanency? Should they?

In view of this major inadequacy, there seems to be no choice but to continue the current water quality management system.

TCM/BNY/ml-j

cc: D. McGillicuddy ✓

## SOURCE OF COMMENTS

Commonwealth of Massachusetts  
Division of Water Pollution Control, Thomas C. McMahon

RESPONSE - Numbers correspond to numbering of review comment letter

### General Comments:

Page 1, Para 3 - Costs specific to Berkshire County were used wherever possible. Appendix 1 has been expanded to more fully explain cost analysis procedures.

Page 1, Para 4 - If the plan's recommendations are followed the 1983 national goal of P.L. 92-500 will be met. In some cases the Commonwealth's present water quality standards will not be met, and changes to the water quality standards are recommended.

### Specific Comments:

1. Costs have been recalculated as requested.
- 2,3. Chapter H has been modified to incorporate the recommendations of the recently completed 201 study in Great Barrington. The recommended partial separation project will eliminate combined sewer overflows.
4. The Draft Plan/EIS recommendations were for upgrading the Stockbridge STP discharge to meet state and federal enforcement program requirements. The Final Plan/EIS recommendations for the Stockbridge STP are substantially different, but are still in conformance with state and federal enforcement programs.
5. See response under General Comments, Page 1, Para 3 above.
6. Municipal and industrial treatment considerations were based on Class B criteria. Note, for example the 5.0 mg/l dissolved oxygen standard used in evaluation of alternative point source management strategies (Section 5.0 of Chapter G and elsewhere).
7. The Chapter G of the Plan has been expanded to note that resolution of the issue of phosphorus removal at the Pittsfield STP is expected to take place after analysis of water quality data collected during the summer of 1978.
8. The dissolved oxygen value of 5.0 mg/l is now used throughout the entire report.
9. As noted, the plan recommends modification of the water quality standards rather than change of the river use classification.

10. We agree, and hope the state will encourage such testing of chara and other substitutes to take place. We also note that close professional supervision for any lake management measure is recommended in the report.
11. Changes have been made in Chapters I and J to place more emphasis on the development of "Best Management Practices". Quantitative cost-effective analysis of coliform controls were presented in Chapters H and I.
12. The BCRPC has provided '208' communities with its population projections and nearly all have concurred in them by utilizing them in various types of functional planning, including sewerage, water supply, housing, recreation and land use. The BCRPC Commissioners adopted the population projections as the standard for the region. The BCRPC has not requested formal local adoption of the projections as most communities are willing to work with the projections on a cooperative basis and attaching a mandatory character to them would be counterproductive.
13. The BCRPC did respond to the request. It contacted the telephone and electric companies to obtain their seasonal data and projections. It was found that they had no projections of seasonal population of the area and their historical data was no better than the BCRPC's own field data. All who were contacted on the question of seasonal population projections acknowledged the problems and near impossibility of such projections. Indeed, it can be stated that hardly any local seasonal projection is reliably accurate enough to "be accepted in a limiting sense". In any case, no projection is "verified" until it becomes historical fact. The BCRPC has met with the authors of the UMASS trouism study and will hopefully work with them in developing a seasonal population projection methodology after they have completed gathering their multi-year data base. In the meantime, the BCRPC will work with the seasonal figures in the 208 report which were based on field counts and show no significant net increase or decrease of the past ten years. There are no signs of major changes in the seasonal population, and the BCRPC projections accordingly show a slow growth rate of approximately .5 percent per year.
14. The potential problem of conversion of seasonal quarters in terms of water quality and sewage has been addressed. The great majority of seasonal dwellings in the area are around lakes in Monterey, Stockbridge, Lanesborough and Hinsdale. The lake water quality and phosphorus impacts from these areas have been addressed in Chapter D and Chapter F. Sewering is now recommended for the lakeside seasonal and year-round developments in Stockbridge, Lanesborough and Hinsdale. Thus, nearly all aggregations of seasonal dwellings will be sewered, and any sizeable conversions from seasonal to year-round should not present serious water quality problems. (It can be noted that in its housing plan the BCRPC projected no sizable net change in seasonal dwellings). Lastly, Chapter F, especially Section 3.0, Septic System Management and Septage Disposal, has been expanded and covers the remaining areas of seasonal development. The potential for septic system operational problems with conversion from seasonal to permanent use has been specifically noted.

15. Land use data has been tabulated and mapped. Geographic distinctions have been made via the town-level projections. The BCRPC has been working with the consultants to the Regional Transportation Plan to breakdown the projections to a sub-town level. However, it has been found that due to the very slow population growth rate of only 1/3 of one percent per year that the area will not undergo rapid urbanization of particular growth sectors, but rather will undergo slow incremental growth dispersed throughout the area. This principle provides a meaningful basis for the BCRPC sewer servicing recommendations for correction of existing potential problem areas, but not growth areas per se due to lack of pressure. And, it should be noted, the 208 area already has a very high proportion of its population sewered.

See also response to comments from the Massachusetts Department of Public Works, Peter Donadio.

16. The BCRPC has been working with the consultant to the Regional Transportation Plan in identifying, modeling and projecting plausible alternative development scenarios for the region. It has been found that the region can not expect to vary much from its present slow-to-stagnant growth trends even with different scenarios. This is the same fundamental growth assumption which underlies the 208 plan, and its implications for water quality planning are clear: focus on the correction of existing problems and on the protection of key environmental areas. In terms of the latter point, the BCRPC has not costed out the expense of controls for all types of environmental areas. Instead, the BCRPC has recommended controls for development in environmentally critical areas of quantitatively consequential impact on water quality. Although there are some costs associated with the effectuation of the recommended land use guidelines, they are obviously preferred to the alternative cost of possibly losing practical use of our large lakes and primary groundwater sources. The costs of these losses would range in the many millions of dollars.

See also revised Section 3.0 of Chapter C.

17. The BCRPC did not purport to recommend every type of important natural area for special water quality controls. The development guidelines map shows what the BCRPC believes are the most important critical areas in terms of water quality worthy of the special controls identified. The drinking water recharge areas are not the only critical wetlands identified; large lakes and their tributaries have also been identified. Steep slopes are more critical to large lakes because of their slower pass-through time, their settling basin-lake qualities, the unique aspects of lake weed growth and eutrophication, and the uniquely high public expectations for lake water quality. (See Section 7.0, Chapter D.) As mentioned in the report, the BCRPC has avoided the temptation to recommend special land use controls for every type of area that has some relationship to water quality. Instead it has made recommendations only for those which have a demonstratable impact on water quality.

See also the responses to comments from the U. S. Environmental Protection Agency, William Nuzzo, and the U. S. Department of the Interior, William Patterson, on regulation of other natural areas. See comment by the Massachusetts Department of Community Affairs, John Sawyer, relative to excessive regulation.

18. The recommended development guidelines and controls will be effectuated under the existing institutional arrangements; i.e. the local planning board, selectmen, and enforcement officials. The BCRPC's management continuation budget in Chapter K (Section 8.7) includes costs for technical assistance to localities in pursuing the recommended land use controls. Enforcement of the controls is assumed to be part of the normal activities of local enforcement officials.
19. The BCRPC recognizes the importance of this comment, and the dilemma it presents. The difficulty lies in the fact that historically water quality programs and funds and the resultant management institutions have been focused on riverine discharges and sewage management to the neglect of lake water quality where most of our water contact uses take place. This trend has largely continued at the state and federal levels which have been noticeably slow in pushing for or funding lake water quality improvements. Indeed, many of the state and federal water quality standards are so riverine-oriented that they can not be practically applied to lakes. Whatever impetus exists for lake management has grown from ad-hoc lake-user groups which have had no support from the major regulatory or funding programs of the state and federal governments. Given this situation, and the limited resources which can be generated locally from the already overburdened Massachusetts property tax, it is felt that each locality should be allowed to evolve their own best mechanism to respond to their lake management problem. It would be very impractical to recommend highly specified management and funding arrangements for lake management when it is such a low state and federal priority and local funds are so constrained. Indeed, at this time a highly detailed management and funding program would be counterproductive at the local level because it would be perceived as a mandated program which must be funded locally.
20. The costs of recommended strategies are more clearly presented in the Final Plan/EIS, (Section 5.3 of Chapter E).
21. Land Use Guidelines have been amended in accordance with the suggestion.
- 22,23. We concur. Also, the note on the pocket map indicates that sewer service areas are approximations only.
24. The need for 201 studies needed for septage disposal facilities in Pittsfield and Great Barrington is now clearly stated in Section 3.5 of Chapter F.

25. The possibility and purposes of an urban runoff demonstration program in the Pittsfield area is now discussed in Section 6.1 of Chapter I.
26. Analysis of land use controls, including subdivision regulation, is presented in Chapter C.
27. Chapter K has been expanded to include a discussion and analysis of water quality management agencies and institutions. Other sections of the report, such as the septic system management program (Section 3.0 of Chapter F) have been supplemented with additional information on organizational arrangements and staffing levels. Municipal tax rate impacts are now provided in Table K-3.

M E M O R A N D U M

SUBJECT: Berkshire County Regional Planning  
Commission, Water Quality Manage-  
ment Plan for the Upper Housatonic  
River Draft Plan Environmental  
Impact Statement

TO: Andrew Flynn  
FROM: Paul Watson  
THROUGH: George Coogan *GC*  
DATE: May 2, 1978

Review by this agency was limited to A-10, B-6, and Chapter E.

The recommendations are moderate and entirely adequate for the purposes of this plan.



MICHAEL S. DUKAKIS  
GOVERNOR

WILLIAM G. FLYNN  
SECRETARY

*The Commonwealth of Massachusetts*  
*Department of Community Affairs*

*One Ashburton Place*  
*Boston, Mass. 02108*

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MAY 12 1978

**BERKSHIRE COUNTY**  
**REGIONAL PLANNING COMMISSION**

May 10, 1978

Mr. Richard Holmes  
Berkshire County Regional  
Planning Commission  
10 Fenn Street  
Pittsfield, Massachusetts 01201

Dear Mr. Holmes:

The Department of Community Affairs has received a copy of the Berkshire County Regional Planning Commission's draft plan/environmental impact statement, Water Quality Management Plan for the Upper Housatonic River, and has had the opportunity to review that document. We regret the delay in our review, which delay resulted from the Department's involvement with the Federal Disaster Assistance Administration through early April.

Throughout the draft plan, it is emphasized that Federal Funding programs should be altered in order to better meet the water quality needs of the Upper Housatonic River Basin. The Department shares the Berkshire County Regional Planning Commission's concern that "a substantial increase in local funding may be required for implementation" of water quality measures and that "for those measures where state/federal aid is less [than] certain... the necessity for substantial local financing may be a major obstacle to implementation." Because Federal funding programs may not be altered, as the Planning Commission desires, we were disappointed that the report did not indicate the projected impact of its various proposals upon local tax rates in the 208 area. In addition, it is not clear what (if any) proportion of the costs of wastewater treatment will be borne by industrial polluters directly through user charges. We feel documentation of this type would be useful to local officials in the 208 area and could assist the Planning Commission in its efforts to obtain the grant flexibility it desires.

In its review of materials prepared by the State's 208 agencies, the Department has been concerned that the adoption of many of the land use controls for improving water quality discussed in those reports may make it more difficult to construct low and moderate income housing in Massachusetts. Because it is not clear what specific land use controls are being prepared for specific areas in the Berkshire 208 area, it is possible that communities might opt for the most stringent controls, in order to insure that there be no water quality problems anywhere within their boundaries.

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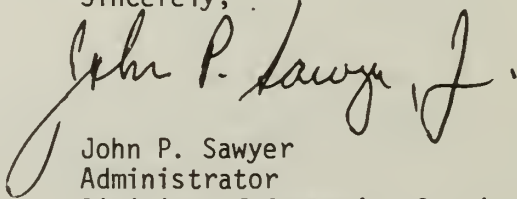
Therefore, we were pleased to note the Planning Commission's stated policy "not to advocate widespread application of land use controls when their effect on water quality can be demonstrated to be quantitatively inconsequential." We feel that this is especially significant, for such controls could be implemented by communities more inexpensively than could most other aspects of the water quality program outlined in the Berkshire County document. DCA wishes to emphasize that the State's 208 agencies must recognize the relationship between land use controls and housing opportunities and must integrate their 208 proposals with their other policies and objectives as planning agencies. In this regard, we would like to note that the Planning Commission's report seems to focus primarily on corrective measures and/or does not give adequate attention to planning for future housing and related activities. For instance, the "minimum land use guidelines for future development near lakes" (Table D-15) rely entirely on density and setbacks, but do not consider whether a required 200 feet setback for a house on a lake is realistic. In addition, there is no discussion of the possible use of performance standards.

With regard to one specific regulatory technique discussed in the Upper Housatonic River draft plan, we wish to emphasize that at present the State's Municipal Planning and Subdivision Legislation gives planning boards no expressed authorization to require environmental impact statements on new developments. It must be recognized that if planning boards are to amend subdivision controls in order to maintain water quality, those amendments must be based upon considerations of safety and adequate access, as opposed to being based solely upon considerations of environmental soundness.

Further, we feel that a community does not have the authority to adopt a general by-law so as to require Environmental Impact Statements. Such a by-law would constitute zoning (see Chapter 40A, Section 1, definition of zoning) and, therefore, requires adoption in accordance with Chapter 40A, Section 5. Also, such statements would have to be information that is required during the special permit process.

Finally, the Department is in agreement with the Planning Commission's recommendation that "recurring" inspections be a part of the region's septic system management program (however, a more exact description than "recurring" would be useful). The Department recognizes the importance of an on-going program and hopes that our recently printed report, Managing Seasonal Neighborhoods in Transition, will be of use to the Commission's 208 staff.

Sincerely,



John P. Sawyer  
Administrator  
Division of Community Services

cc: Robert E. Mendoza, EPA  
David Terry, DEQE  
William Hicks, MEPA  
Jerry Hayes, DCA  
Wayne Sherwood, DCA

## SOURCE OF COMMENTS

Commonwealth of Massachusetts  
Department of Community Affairs, John P. Sawyer

## RESPONSE

### Page 1, Para 2

Tax rate impacts are now included in the report, in Table K-3. The impacts are derived from the 208 program annual local costs to each municipality, developed on the basis of current federal/state cost sharing programs.

Industries will pay only a small portion of the costs of future wastewater treatment improvements for the following reasons:

1. The only discharges which are recommended for improvement are the Pittsfield and Stockbridge sewage treatment plants.
2. Stockbridge has no industrial sources, nor is it expected to have major industries within the 20-year timeframe of the plan.
3. As noted in Section 4.0 of Chapter F, only minor quantities of industrial wastes are discharged into the Pittsfield sewer system.

### Page 1, Para 3

(See also the response to the comments from the Massachusetts Department of Public Works, Office of the Commissioner).

It is true that the plan primarily recommends structural measures to correct past problems. Future growth rates are expected to be slow and not demand the installation of many new sewer facilities as this comment seems to suggest. Only minimum land use guidelines for certain critical areas have been recommended which the BCRPC has tried to limit with clear specifications. The BCRPC has not recommended a 200 ft. housing setback from lakes as this comment asserts, but rather a 200 ft. setback of the nearest point of a leaching field to the lake. And, the recommended development guidelines themselves incorporate performance standards.

### Page 2, Para 2

This point is well taken; local environmental impact statements which are required by the subdivision control law must relate to considerations of public safety and safe access.

### Page 2, Para 3

This point is also well taken; it can be a matter of legitimate debate as to whether local bylaws requiring environmental impact statements must be part of the local zoning bylaw.

It should be noted that the 208 plan does not make a priority out of either of the above two environmental review techniques which were listed only as potential land use controls.

Page 2, Para 4

Description of the recommended inspection program has been included in the expanded Section 3.0 of Chapter F, Septic System Management and Septage Disposal.



# The Commonwealth of Massachusetts

Executive Office of Transportation and Construction

Department of Public Works

Office of the Commissioner

100 Nashua Street, Boston 02114

May 2, 1978

U. S. Environmental Protection  
Agency  
Environmental and Economic  
Impact Office  
John F. Kennedy Federal Building  
Room 2003  
Boston, Massachusetts 02203

ATTN: Robert E. Mendoza

Dear Mr. Mendoza:

We have completed a review of the Draft Plan/Environmental Impact Statement Water Quality Management Plan for the Upper Housatonic River produced by the Berkshire County Regional Planning Commission (BCRPC) and the following comments are provided.

It is assumed that this report is consistent with the approved Project Control Plan and that the land use and growth elements of the analysis are consistent with Massachusetts Chapter 807 growth policy statements.

In making these assumptions the Department expects compatibility of land use and growth data and analyses and other aspects of the 208 Study with the same elements of the concurrent regional transportation planning study funded by the Department in a working partnership with the BCRPC. The Department recognizes the BCRPC as the agency responsible for all functional planning in the region and in this regard the BCRPC is funded to assure the level of coordination necessary to make transportation plans and programs compatible with other functional planning activities as elements of the comprehensive regional plan.

It is on the basis described above that the statement in Chapter C, entitled Growth and Land Use, is accepted. This statement indicates that, though the regional transportation study began later than was expected resulting in the full input

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MAY 5 1978

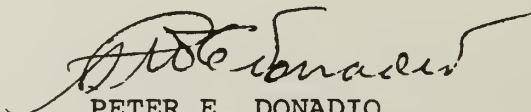
Robert Mendoza

May 2, 1978

from the transportation plan not being available, preliminary data from the transportation effort has been incorporated and is considered adequate to meet the needs of the 208 plan. In other words, both the WQMP and the Transportation Plan are, or will be, based on the same comprehensive regional growth and land use assumptions and data.

Finally, a concern is noted with this draft plan as an "Environmental Impact Statement" because there is no explicit statement of the impact of this plan for water quality on present and future transportation systems. It is felt that, although we assume the 208 plan to be consistent with other functional plans and systems, as an "environmental statement" it should explicitly note the impact it will have on transportation and other aspects of the environment -- natural and manmade. Where structural solutions, which could permit or induce significant growth and land use change, are recommended there could be impacts on existing travel corridors which should be discussed.

Very truly yours,



PETER E. DONADIO  
ACTING COMMISSIONER

cc: DEQE  
OSP  
BCRPC  
John Hurley

## SOURCE OF COMMENTS

Commonwealth of Massachusetts  
Department of Public Works, Peter Donadio

## RESPONSE

It is a correct assumption that the report is consistent with local growth policy statements, as are all current BCRPC projections and functional planning programs. See also the review comment letter from the Massachusetts Office of State Planning.

The water quality facilities proposed in the 208 report are not expected to have the very high growth inducing impacts often seen in other more rapidly-growing areas, where growth may gravitate to recently sewered areas and overtax other facilities such as roads. Recent sewer extensions have not been accompanied by rapid growth because the area has an almost stagnant growth rate, and the projection is for slow growth. Nowhere does the plan propose sewerage as a means of accomodating growth, per se.

Nearly all of the structural improvements in the plan relate to sewers and the correcting of existing problems. One exception is the Woods Pond Bypass, which if built would parallel the railroad line running south from Pittsfield. In terms of non-structural recommendations, these relate to land use controls and usually entail the preservation of existing water quality (such as groundwater) or its restoration (such as in lakes).

The BCRPC, as noted in the plan, has not recommended numerous land use controls to preserve water quality, but only those carefully selected controls which are of significant and effective benefit. Some of these land use guidelines can indirectly affect plans for other facilities. An example of this would be the salt guidelines for groundwater recharge areas and the affect these may have on highway salting and housing construction. Neither, however, is precluded by the guidelines and in any case the "impact creating" force would not be the preservation of groundwater quality, but unsound highway maintenance and housing development. Any functional plan should follow sound environmental guidelines unless there is a critical overriding need which has been deemed necessary to meet.



EVELYN F. MURPHY  
SECRETARY

*The Commonwealth of Massachusetts*  
*Executive Office of Environmental Affairs*  
*100 Cambridge Street*  
*Boston, Massachusetts 02202*

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MAY 30 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

STATEMENT OF THE SECRETARY

ON

DRAFT ENVIRONMENTAL IMPACT REPORT

The Secretary of Environmental Affairs herein issues a statement that the Draft Environmental Impact Report submitted on the below referenced project does adequately and properly comply with the Massachusetts General Laws, Chapter 30, Section 62 and the regulations governing the preparation of environmental impact reports.

Environmental Affairs File Number: 02712

Submitted by: Department of Environmental Quality Engineering

Date Received: March 15, 1978

Project Identification: 208 Wastewater Management Plan  
for the Upper Housatonic River  
(Berkshire County Regional Planning  
Commission)

The Draft Plan/Environmental Impact Statement is herein reviewed as a state Environmental Impact Report. The comments are made with regard to consideration of environmental impacts, mitigation efforts and inclusion of alternatives as required pursuant to Chapter 30, Section 62. This review does not include a review of the plan itself or of its adequacy for certification according to the established procedures of D.E.Q.E. for reviewing and certifying such plans.

The Draft/Environmental Impact Statement for Water Quality Management for the Upper Housatonic River is an admirable document which seeks to combine analysis, planning and environmental assessment for a 9-municipality area into a single document. The task of coordinating regional planning and analysis with local participation and in many cases fairly well developed 201 plans presents a major challenge and undertaking.

The organization of the report is excellent, although an index would have been helpful to readers not fully immersed in the study process itself. Graphical material is well presented, although some technical material is inevitably difficult for the

layman. However, the text is generally well written and free of unnecessary technical jargon. As such, it meets the difficult assignment of serving as both a technical and a public document.

Two issues which the report clearly addresses are the strictness of the standards established by P.L. 92-500 and the lack of sufficient capital funds at state and national levels to meet projected construction needs. The 208 process has the option of programming on the basis of strict compliance with the standards or with realistic evaluation of costs and funding availability. Since it does appear that sufficient funds for major construction programs will not be readily forthcoming in the foreseeable future, the low-funding option appears to be a reasonable and practical alternative for consideration in the Environmental Impact Report.

In the matter of industrial discharges, there are also economic limitations. The report (pp. B-14, 15) recommends meeting 1977 guidelines for industrial discharge, but not 1983 guides, on the basis of additional expense yielding only very minor improvements to river quality. This conclusion suggests that the law of diminishing returns is applicable to the 208 process. Would it be possible to develop a table or figure showing the trends in historical water quality over recent decades --- indicating recent year expenditures and improvements in water quality, including the projected 1977/1983 quality and cost information? The planning judgements which were considered useful in optimizing the trade-off of environmental improvement and cost would also be useful in evaluating the environmental impacts and mitigating measures proposed for the alternate programs.

Because P.L. 92-500 concentrated on water quality issues, strict adherence to P.L. 92-500 may involve some detrimental impacts on other aspects of the environment. To this extent, the EIR must, as an environmental planning document, consider a balancing of issues: the multiple dimensions of the environment, matters of energy, water supply, cost, construction vs. operational impacts, etc. The report is correct in addressing all environmental impacts associated with meeting the strict legal requirements. The complexity of choice is particularly evident when a proposed improvement to water quality will result in changes to the natural landscape, aesthetic modifications, and construction impacts. Because the report is primarily a 208 plan, there is an understandable emphasis on water quality issues.

The 208 plan is commendable for seeking to take a new look at the water quality problem and respond to local concerns, and especially for the emphasis on addressing lake eutrophication, even though there are no state or federal mandates to develop such plans. The high priority assigned to lake management involves considerable courage. Improved manufacturing techniques and improvements to sewage treatment plants can assist fast flowing rivers towards rapid restoration of water quality, but the water quality of our lakes and the steady trends towards eutrophication are frequently

more difficult to control. Human lifestyles, septage systems and agricultural habits have accelerated certain natural trends in changing of our fresh water lakes, so that any effort to stabilize the ecological condition of the lakes requires resistance against both man-made pollution and the forces of nature.

While the first priority of the 208 plan is lake eutrophication control, only \$1.3 million - - all locally funded - - out of a total \$52.7 million recommended program, is directly targeted for lake management. By contrast, sewerage programs involve \$35.8 million in funds, of which \$28.1 million is eligible for federal or state assistance. Another noteworthy funding assistance imbalance occurs in the area of sludge disposal.

The EIR touches on a major difficulty in developing benefit/cost analyses, because the special nature of certain federal assistance policies tends to favor large capital projects over smaller scale management or maintenance programs. A program may be cost-effective from a narrow consideration of the local share. If total costs including state and federal shares are considered, a different cost-effectiveness conclusion might be reached. There is a natural tendency for local officials to perceive federal funds as "free", whereas any local funding becomes a direct burden to be imposed on local taxpayers. Therefore, benefit/cost analyses can be severely swayed by the source of the funding. The draft report clearly and properly stresses the need to correct this inequity (page A-3) through reference to the experience of federal funding for transportation, whereby new policies are being implemented to provide for operational as well as capital programs. In view of the considerable advantages capital projects now have in terms of funding, public interest, and technological glamour, the 208 plan should make a special effort to emphasize non-capital or low-capital solutions and the management techniques necessary for their successful implementation. This issue is quite significant because projects involving low-capital, maintenance or management are not only often very cost-effective but also involve minimal disruption of the natural environment.

Some sections of the plan are clearly at a more detailed stage of study and analysis than are others. Issues of lake eutrophication are very well developed, but the full range of environmental impacts from proposals for low-flow augmentation of the Hoosatic River must await more detailed future study. The report clearly lays out the basic alternatives and discusses some of the major types of impacts associated with them. The creation of LFA concepts will involve major changes in dams, impoundment areas, and natural landscape ecology. Similarly, construction of the 4-mile Woods Pond bypass sewer line would involve construction impacts and possibly longer range aesthetic and vegetation impacts along the river.

Furthermore, any proposals for structural changes to the

Hoosatic drainage basin or the Pittsfield STP should consider the immediate and long range goals for Woods Pond. The report properly notes (p. G-8) that in nature there is considerable variation in the quality and stage of eutrophication of lakes, and that eutrophication can have advantages for certain environmental values. Already, Woods Pond is a special area for wildlife of interest to hunters and nature enthusiasts. Clearly, such land use is not compatible with other goals for swimmable waters. It would seem reasonable not to seek to maintain all waters as a uniform quality and instead to allow variations which meet the individual needs of man and nature.

The Final Report should include a clearer presentation of the relationship between 201 and 208 plans, indicating which communities have approved 201 plans and which projects are in the various stages of design or construction development (The reference on page F-41 to section 1.0 should be Section 2.0). It should also seek a clearer distinction among the types of septage systems failures. If a septage system fails visibly without significant damage to the environment and if prompt remedial action is taken, the incident should be recorded as an example of a "failsafe" system. If a septage system fails and is not observed or cleared up and if the septage wastes threaten well fields, ponds or streams, we have a case of undesirable or unsafe failure. The magnitude of the real septage failure problem should be more clearly defined.

It would be useful to have a clearer recognition of the relationship of municipal sewer and water system construction to water consumption and the impacts of such water use on sewage system loading. On the other side of the ledger, the possibilities of water conservation and recycling will tend to reduce STP loadings. Special management programs could be considered for Lee, Lenox and Stockbridge for periods of heavy concentrations of summer visitors. Accelerated programs of septic system maintenance might be considered, as well as more extensive use of chemical or dry toilets.

Sewer systems in themselves do not solve problems: they move them from one place to another. Often such centralization allows for systematic processing of wastes, while at other times numerous small problems may be combined into a large, almost unmanageable task of dealing with high volume mixed wastes. Moreover, sludge disposal problems can become quite severe, with the potential of creating extensive leachate problems in future years.

The sludge disposal practices for existing and future conditions (Table F-11 and F-15) should be made parallel, with consistent units for easy comparison. There should also be a specific listing of the nature of the sludge produced (sewage; industrial; mixed) and what are the significant organic and inorganic elements and their concentrations. The problem of PCBs, heavy metals and industrial chemicals is sufficiently complex that a separate study might be warranted. It would be most useful to the overall planning effort if the 208 plan could provide direction in terms of issues which need more extensive study, such as PCBs, heavy metals, sludge disposal, landfill sites, and operational techniques for landfills

to minimize water pollution.

It appears that the estimate of metallic wastes is based on general literature searches (p. I-t), so there should be more emphasis on evaluating current Hoosatic sampling data for trace elements. Ideally, we should like to know what are the types of waste chemicals being discharged and in what quantities. In regard to the special question of PCBs, there still is a need for local and regional planning efforts to identify PCB impacts and assist in evaluating the problem and identifying possible solutions.

It is hoped that as a result of the numerous community meetings and public comments that Chapter K on implementation of a management plan can become more detailed, possibly including a work program indicating how each element of the 208 plan would be reviewed and moved on to the next stage of development and implementation. Whereas a full strategy for implementation involves much complexity and uncertainty, it would be most useful to identify what is the immediate next step which should be taken beyond the 208 plan for the various key elements.

The management plan must also address the critical issue of enforcement and avoidance of undesirable side-effects, such as the objective of preventing "illegal connection and dumping of pollutants into storm sewers". (p.B-20).

It is clear that a major goal of the 208 study has centered on the difficult task of seeking accord and consensus on various plans affecting the 9 municipalities. Under the circumstances, it is impossible for the 208 plan to satisfy everyone, so that inevitable compromises must be reached in order that regional acceptability of the plan can be achieved. The plan must be responsive to local preferences and goals, yet inevitably is subject to stress whenever adjacent communities disagree over problems and solutions. There is a natural tendency to recommend plans for a town which the town officials want, rather than the possibly different proposals of adjacent communities.

There must be a delicate balance of respect and disagreement among state officials, regional planners, local officials and citizens. Just as state officials often hear direct local criticism of state policy and thereby benefit from the exchange, so should local officials and citizens be more extensively presented with alternatives, provided, of course, that the comparisons do not become overwhelmingly complex or confusing. The regional planning agencies and the 208 plan should be able to assist in resolving local disputes -- such as the differing approaches between Lee and Lenox to the eutrophication of Laurel Lake -- in order that regional planning can have its special significance. If there are differences between area communities on issues, it would be well to give a fair discussion

(5)

to the different perspectives. Thus can regional planning assist in resolving deadlocks between communities and consequent inaction. It is the ability of the 208 planning process to take a comprehensive look at regional water quality problems (and also to serve as a possible mediating influence between stalemated communities) which serves to make the 208 process something of special value.

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DATE

EFM/SK/jmd

DAVE TERRI

E. F. MURPHY  
EVELYN F. MURPHY, SECRETARY

## SOURCE OF COMMENTS

Commonwealth of Massachusetts  
Executive Office of Environmental Affairs, Evelyn F. Murphy

## RESPONSE

### Page 2, Para 3

An accurate historical record of expenditures and improvements in water quality was not readily available for use in this report. However, improvements in the quality of the water quality limited segment in moving from 1974 to 1977 pollutant loadings are shown in Figure G-3. Also, the subject of costs vs. benefits for 1983 industrial discharge limitations was covered in the report of the National Commission on Water Quality. This has led, in part, to modifications of these requirements in the 1977 Clean Water Act. A necessary part of future 208 plan updating procedures will be to assess the impact of the 1977 Clean Water Act on the plan as it is now written.

### Page 3, Para 2

The report has been modified to point out more clearly that substantial lakeshore sewerage is recommended. The total costs for six lakes is over \$7.7 million; these costs are counted only once, in Chapter F. However, the nutrient reduction effects of this sewerage have been incorporated into the overall lake management programs defined in Chapter D.

### Page 3, Para 4

Chapter G has been modified to include the recommendation that an Environmental Impact Statement be prepared concurrently with the detailed 201 plan for the Woods Pond effluent bypass.

### Page 4, Para 2

Chapter F has been re-organized to more clearly present the 208/201 relationships. (See Section 5.0 of Chapter F.)

Septic system failures have been more fully described in the expanded Section 3.0 of Chapter F, Septic System Management and Septage Disposal.

### Page 4, Para 3

Per capita water consumption figures for 1975 and 2000 are presented in Table E-1, enabling easy computation of reduced "additional capacity" needs for municipalities that initiate widespread water conservation programs. Water conservation to improve septic system operation is now included in the recommended management program (Section 3.4 of Chapter F).

Page 4, Para 4

The increased waste loadings and flows to the treatment plants due to sewer extensions were factored into the projections of future loads to the river, shown in Table F-13 in the Draft Plan/EIS. Sludge disposal is given further consideration in the Final Plan/EIS, in Section 4.2 of Chapter F.

Page 4, Para 5

Chapter F has been re-organized and expanded to present a more coherent discussion of sludge disposal (Section 4.2 of Chapter F).

The question of PCB's and solution of PCB problems remains largely unknown. The Draft Plan/EIS briefly discussed PCB's in the Introduction (Section 11.0 of Chapter A), the chapter on Groundwater Protection (Section 4.0 of Chapter E), and in the discussion of Nonpoint Sources affecting the river (Section 9.0 of Chapter J). The issue of PCB's was not part of the scope of this 208 plan, and is perhaps best handled through specialized state and federal programs.

Page 5, Para 2

As noted throughout the report, wet weather sampling data is generally lacking, although a limited amount of this type data was collected in the 208 program. Existing Housatonic sampling data is primarily from average summer flow and low flow periods and does not provide much insight into nonpoint source problems.

Page 5, Para 3

Chapter K has been expanded to include a full description and analysis of water quality management agencies and institutions. Also included is an outline of the recommended initial implementation program, with figures displaying the proposed participation of local, regional, state and federal officials.

Page 5, Para 4

Enforcement of controls to prevent illegal connection and dumping of pollutants into storm sewers is expected to be within the existing legal/institutional structure, principally the Pittsfield Public Works Department (See Section 7.1 of Chapter I).

Page 5, Para 5 and Para 6

Summaries of local meetings held during the Draft Plan/EIS review period are contained within this Public Comment Appendix. A description of the way in which public participation and intergovernmental coordination was incorporated into the planning process is provided in Appendix 2 of the Final Plan/EIS.



# *The Commonwealth of Massachusetts*

## *Office of the Secretary*

### *Massachusetts Historical Commission*

*Secretary of the  
Commonwealth*

*294 Washington Street Boston, Massachusetts 02108*

*(617) 727-8470*

**RECEIVED**

MEMORANDUM

JUL 13 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

TO: DEQE 208 Planning Staff  
Regional Planning Agencies

FROM: Patricia L. Weslowski, <sup>P/LN</sup> State Historic Preservation Officer

DATE: July 12, 1978

RE: Final 208 Water Quality Management Plan

MHC would like to take this opportunity in commenting on the Final EIS for the 208 water quality management plans to remind EPA, DEQE, and the Massachusetts Regional Planning Agencies of their responsibilities under the National Historic Preservation Act of 1966 and E011593 to protect historic resources which might be threatened from federal undertakings. This protection extends to both properties listed in and eligible for listing in the National Register of Historic Places.

As the 208 plans are implemented and construction is planned, it may be necessary to survey the area of any proposed action in order to determine if NR listed or eligible properties might be affected. If properties might be affected, the procedures of the Advisory Council on Historic Preservation must be implemented (36 CFR 800) in order to protect historic resources.

MHC is available to provide information on historic and archaeological properties in the state, and can help develop appropriate scopes of work for field surveys. We should also be consulted during the process of Advisory Council review.

If you have any questions, please don't hesitate to call.



OFFICE OF THE  
COMMISSIONER

*The Commonwealth of Massachusetts*  
*Department of Commerce and Development*  
*Leverett Saltonstall Building, 13th Floor*  
*Government Center, Boston, Mass. 02202*

(617) 727-3218

July 10, 1978

Mr. David Terry -  
Department of Environmental Quality Engineering  
100 Cambridge Street  
Boston, Massachusetts 02202

Dear Mr. Terry:

As required by Article II, Section 2(b) of the Section 208 Memorandum of Agreement between the Department of Environmental Quality Engineering and the Massachusetts Department of Commerce and Development, I am sending two copies of the Department of Commerce and Development's comments on the Berkshire County Regional Planning Commission's Draft 208/EIS.

The Department of Commerce and Development's review and comment on Section 208 plans and reports focuses upon the following general areas for which the Department is responsible: industrial development, expansion of the resort/recreation sector of the economy, maintenance and development of economic opportunity and related matters such as employment trends. Review of relevant outputs will include comment upon the existence of any conflicts which may be uncovered between the 208 plans and general Commerce and Development policy or specific aims.

I trust that this definition of the areas of DCD concern complies with your requirements and that these areas have been adequately dealt with in the attached comments on the BCRPC Draft 208/EIS.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Crosier", written over the typed name and title.

John D. Crosier  
Commissioner

JDC:mw  
Enclosure

General Comments: The Berkshire County Regional Planning Commission's Draft 208/EIS presents a sensible, balanced approach to meeting the Congressional standard of "fishable/swimmable waters" by 1983. The 208 Plan takes into account the fact that different water bodies have different natural conditions and that it is impractical and costly to require all water bodies to meet the same standards all the time. The BCRPC has recommended, for instance, that, due to the high cost and possible damage to the Housatonic River's ecology of excessive chlorination, the Commonwealth relax its coliform during storms when no one swims in the river, while emphasizing coliform control during normal periods. This sort of flexibility, demonstrated throughout the Plan, is far more encouraging to growth in both the business and tourist sectors than an unbending regulatory approach.

Industrial Development. This is one of the major areas DCD considers in assessing the impacts of the 208 Plan. Manufacturing represents a major portion of the region's income: In 1970 manufacturing accounted for 44% of total county earnings, and projections indicate that this percentage will remain stable. Electrical machinery and supplies presently contribute 36% of this total.

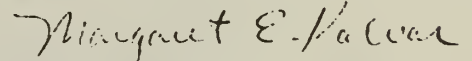
Industry in the Berkshires is composed mainly of General Electric and several paper companies. Business has been cooperative in installing treatment facilities and has accepted their operating costs. However, many fear that neither the technology nor the capital are available to meet 1983 NPDES standards. Since industry is in compliance with the 1977 standards, the BCRPC is wise not to mandate compliance with the 1983 requirements. Going beyond the Class B qualification seems to provide little benefit to the Housatonic River and does not appear cost effective.

Thus, the Berkshire Planning Commission's requirements are reasonable and industry seems willing to cooperate. However, it has been made clear that further mandated expenditures will place a severe burden on existing industry and will make the region less attractive to new industrial development.

Resorts and Recreation. This sector is certainly important in the Berkshire region's economy since the area provides both summer and winter recreation attractions. Although the many lakes are not directly important to tourism, they are an essential part of the scenic environment which draws campers and sportsmen. Canoeing is a major sport on the Housatonic River. Clean water is essential to the preservation of the tourist industry. Thus, a vigorous program of lake harvesting should be instituted as recommended. However, much of the action taken need only be preventative in nature since many of the water bodies in the region are in ecological balance. Woods Pond, for instance, supports a variety of marine life, despite the presence of algae. The Housatonic River is presently attractive and suitable for canoeing. Although the 208 Plan will be helpful in preventing future water quality problems, it will have a positive but slight impact on the tourist industry at present. Thus, to go beyond the moderate plans proposed would be impractical. Given the present quality of the waters of the Housatonic, the option of catching storm water is not cost effective although monitoring, "good housekeeping" practices and catch basin cleaning should be employed. Emphasis should be placed on maintaining the attractiveness of the Berkshires as a tourist area through prevention of future problems rather than attempting abatement of problems which are not very severe.

Economic Opportunity. Slow growth is projected for the Berkshire region. More growth will occur in rural or residential sections than in urban areas. No industry which is a heavy water user will be particularly attracted to the Berkshires--however, care should be taken to insure that no major industries leave, or that no plant closings occur. This can probably be achieved by following the BCRPC's recommendations and not requiring industries to meet the 1983 NPDES standards. At the same time, economic opportunity exists and may expand in the resort/recreation sector. The importance of preventing future water quality problems and of making sure that present conditions are not having an adverse impact should not be under-estimated. The BCRPC Draft 208/EIS appears to reasonably balance the industrial and recreational concerns.

Margaret E. Kalvar



Research Analyst



THE COMMONWEALTH OF MASSACHUSETTS

OFFICE OF STATE PLANNING

JOHN W. MCCORMACK BUILDING ROOM 2101

ONE ASHBURTON PLACE

BOSTON, MASSACHUSETTS 02108

(617) 727-5066

MICHAEL S. DUKAKIS  
GOVERNOR

FRANK T. KEEFE  
DIRECTOR

M E M O R A N D U M

TO: David Standley, Commissioner  
DEQE

FROM: Frank T. Keefe *FTK*

SUBJECT: OSP Review of Areawide "208" Water Quality Management Plans

DATE: August 24, 1978

Attached you will find OSP's comments on the Final Draft "208" Water Quality Management Plans which have been completed thus far by the regional Planning agencies. As you will see, the comments are given from the perspective of the effects these plans will have on the Commonwealth's Growth, Urban Revitalization and Economic Development policies, and the adequacy of the management alternatives discussion. While there were few if any acknowledgements of the Local Growth Policies much less State Policies, the "208" recommendations are generally supportive. For example, there were few mentions of the benefits for downtown growth and revitalization derived from sewage treatment plant expansions, and the full impact on industries trying to comply with clean water laws and regulations was seldom discussed in depth. However, since the recommendations follow the policies, in the main, I see no problem with the Governor certifying them from that standpoint.

However, my major concern with the RPA's "208" products (the process and various governmental roles will be the topics of a future letter) is that their discussions of management and coordination techniques are consistently weak and superficial.

I would think that identifying potential conflicts, examining decision making forums, and exploring innovative ways to coordinate and monitor the many intergovernmental management agencies would be appropriate subject matter for "208" management plans. However, in many cases this opportunity was apparently declined.

Consequently, I am recommending that certification for areawide management be withheld until a more comprehensive, detailed discussion of management and coordinative alternatives is completed in supplementary work. The exceptions to this are SRPEDD, Berkshire County, and Central Massachusetts RPA's which have adequately addressed the management topic.

OSP recommends that the Governor certify "208" Water Quality Management Plans according to the following chart:

| <u>RPA</u>                                   | <u>State and Local<br/>Policy Compatibility</u> | <u>Adequacy of Management<br/>Alternatives Discussion</u> |
|----------------------------------------------|-------------------------------------------------|-----------------------------------------------------------|
| Berkshire County<br>(Upper Housatonic River) | Yes                                             | Yes                                                       |
| Cape Cod                                     | Yes                                             | No                                                        |
| Central Massachusetts                        | Yes                                             | Yes                                                       |
| Martha's Vineyard                            | Yes                                             | No                                                        |
| Montachusett-Nashua                          | Yes                                             | No                                                        |
| Old Colony                                   | Yes                                             | No                                                        |
| SRPEDD                                       | Yes                                             | Yes                                                       |

Note: Reviews of the MAPC and NMAC "208" plans will be completed in the near future.

## Review of "208" Water Quality Management Plan for the Upper Housatonic River, Berkshire County

This plan would cost some 52 million in 1976 dollars over 20 years to maintain the Housatonic as a Class B (fishable-swimable) river. This expenditure, along with those being made by area polluters to bring the river up to 1977 National Pollution Discharge Elimination System standards, would make the river as clean as economically possible, according to the plan. The plan thus recommends that the Upper Housatonic be exempted from 1973 NPDES standards, which would impose costs of \$55 million on the area (\$8.2 million on local industries) but produce marginal benefits.

### I. Compatibility with State Policies

The plan does not recommend the construction of new sewage treatment plants, but it does recommend a few significant capital projects. It proposes new sewerage for the center of Lanesborough, and other areas with failing septic systems, but little new sewerage in undeveloped areas. Other capital recommendations are for the overhaul of the Stockbridge sewage treatment plant; construction of a septage pre-treatment facility at the Pittsfield plant and repair of that plant's sludge beds; and new sludge-handling equipment in Lenox. Otherwise, the plan puts major emphasis on "good house-keeping" measures, including land use guidelines to prevent damaging runoff; patching of leaky sewer pipes; lake management techniques; and street and catch basin cleaning. Many of these measures are not reimbursable by the federal government, and the plan urges that existing grants be widened in scope.

Pittsfield is the only city in the subject area. Major recommendations for it include the septage treatment and sludge bed improvements mentioned above, the diversion of discharge from the city sewage treatment plant to a point below Woods Pond in Lenox (via a pipeline); sewer pipe repair; sewer extensions along Onota Lake; and improved street and catch basin cleaning. Total cost is estimated at \$17,940,000. Twenty-year cost to the City would be \$6,384,000. More immediate capital expenditures would be \$2,044,500 for the City, a portion to be assessed to neighboring towns.

Perhaps the only major, troubling recommendation from a growth policy point of view is the recommendation for the extension of sewers in northern Lenox and along the town's border with Pittsfield. These extensions would be made when the town's sewer capacity is enlarged (also a recommendation). The reported justification is that the extensions are "desired". They should be examined for their impact on growth in downtown Pittsfield (a la the Pyramid mall case).

### II. Water Quality Management Techniques

The plan recommends that the Berkshire County Regional Planning Commission retain overall managerial control over 208 implementation, but that the communities be designated as 208 agencies so that EPA 201 and 208 funding will go directly to them. BCRPC would act to expedite the projects and execute inter-municipal agreements.

The Pittsfield sewage treatment plant already treats 75 percent of the

sewage generated in the area, and is scheduled to receive some of Lenox's in the future. The recommended projects will require new cooperative agreements between Pittsfield and surrounding towns on the Woods Pond by-pass (on cost) and expanded septic sludge treatment (cost and operation); between Great Barrington and other towns on regional septage disposal (cost and operation); between Pittsfield and Lanesborough on a new sewer treatment link-up; and between adjoining towns over lake management strategy.

### III. Unique Proposals

The Woods Pond by-pass project would be an innovative attempt to prevent the further eutrophication (i.e. choking-off by chemical nutrients) of the pond from phosphorus discharged by the Pittsfield sewage treatment plant into the Housatonic upstream. The by-pass pipe will carry the Pittsfield plant's discharge to a point in the river below Woods Pond in Lenox, where the river will be better able to naturally absorb the discharged phosphorus. The alternative - treatment at the Pittsfield sewage treatment plant - would cost some \$14 million more. The project's cost is estimated at \$6 million.



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



May 23, 1978

William R. Adams  
Regional Administrator  
Environmental Protection Agency  
Region I  
John F. Kennedy Building  
Boston, Massachusetts 02203

**RECEIVED**

MAY 24 1978

**BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION**

Dear Mr. Adams:

The Connecticut Department of Environmental Protection has reviewed the draft Environmental Impact Statement (EIS) prepared by the Berkshire County Regional Planning Commission (BCRPC). This draft EIS presents management programs that will likely have a significant impact on the water quality goals for Connecticut's portion of the Housatonic River if the proposed recommendations are implemented.

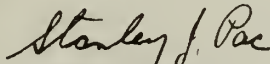
The Department of Environmental Protection is concerned with the BCRPC recommendations for the City of Pittsfield's wastewater treatment plant needs and the Town of Great Barrington's combined sewer system. These recommendations largely ignore Connecticut's water quality goals for the Housatonic River and its impoundments; goals specifically defined in our January, 1976, Phase 1, Housatonic River Basin Plan.

The recommendations of the BCRPC 208 program for the Pittsfield STP would increase phosphorous loadings to the Housatonic River impoundments in Connecticut; an increase which would likely compound the existing eutrophication problems. Further, this office cannot endorse the concept of constructing an extended outfall from Pittsfield's STP to a point below Woods Pond in lieu of the construction of advanced wastewater treatment. This simplistic solution may be economically desirable for Berkshire County, however, it is a regressive recommendation in that water quality for downstream users may be further impaired. It is our opinion this recommendation does not properly consider the intent of the total basin planning concept being promoted nationally under Section 208 of the FWPCA of 1972. For your information, I am enclosing copies of past correspondence to the BCRPC, EPA Region I, and the State of Massachusetts related to Connecticut's policy on phosphorous reduction in the Housatonic River.

The Town of Great Barrington's combined sewerage system causes periodic violations of Water Quality Standards in the Housatonic River in both Massachusetts and Connecticut, a fact recognized by the BCRPC 208 draft EIS. The recommendation to reduce infiltration to the combined sewers, increase street

sweeping and allow for the occasional overflow of combined sewage is similarly not acceptable to the Connecticut Department of Environmental Protection. The elimination of gross combined sewage discharges is of paramount importance to Connecticut's water quality program, evidenced by the number of municipalities committed to this goal. Approval of BCRPC's recommendations regarding combined sewers would also be regressive in terms of state and federal water quality goals and indirectly detrimental to municipal efforts to eliminate such problems in Connecticut. It is therefore recommended that EPA and the State of Massachusetts disapprove both of the BCRCP recommendations discussed above and rely on the results of the on-going facilities planning efforts for developing pollution abatement strategies.

Sincerely yours,

  
Stanley J. Pac  
COMMISSIONER

SJP/FB/am

cc: William Nuzzo,  
Environmental Protection Agency  
  
New England River Basins Commission  
  
Massachusetts Division of Pollution Control  
  
Berkshire County Regional Planning Commission

Enclosures



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



May 3, 1977

Mr. Richard B. Holmes  
Environmental Planner  
Berkshire County Regional Planning Commission  
10 Fenn Street  
Pittsfield, Massachusetts

Dear Mr. Holmes:

Thank you for providing us with an opportunity to review the Upper Housatonic 208 Water Quality Management Plan Phase I Report. We would like to offer some comments relative to the discussion on page F-18 regarding point source phosphorus removal at Pittsfield to control eutrophication in Woods Pond and the Housatonic lakes. We seriously question the validity of using an observed response at Woods Pond as a basis for predicting a response in the Housatonic lakes. Since Woods Pond is nitrogen limited and the Housatonic lakes are phosphorus limited, a reduction in phosphorus loading which has no impact on Woods Pond would assist in reducing eutrophication in the Housatonic lakes. Furthermore, the detention time of Woods Pond, at 19 hours, is considerably shorter than the detention time of Lake Lillinonah, at 17 days. Undoubtedly, large amounts of phosphorus which would not have sufficient time to be converted to algal mass within Woods Pond would subsequently support blooms in the Housatonic lakes. Also, little removal would be provided by Woods Pond because the short detention time would promote flushing of algae and sediment.

Since our 303(e) Housatonic River Basin Plan conservatively estimates that 28% of the total phosphorus load on Lake Lillinonah during the summer months originates from sources in Massachusetts, control of these sources could play a significant role in reducing algal biomass in the Housatonic lakes. We therefore continue to urge consideration of phosphorus removal in Massachusetts as part of the solution to eutrophication of the Housatonic lakes.

Very truly yours,

*Robert B. Taylor*

Robert B. Taylor, Director  
Water Compliance and  
Hazardous Substances

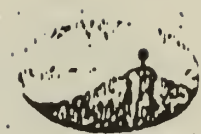
RBT/CF/am



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



May 3, 1977

Thomas C. McMahon, Director  
Division of Water Pollution Control  
160 Cambridge Street  
Boston, Massachusetts 02202

Dear Mr. McMahon:

I would like to take this opportunity to request your cooperation with an experimental phosphorus removal program for the Housatonic River this year. The DEP has determined that phosphorus removal facilities will be required at selected municipal wastewater treatment plants in the Connecticut portion of the basin if it demonstrated that such action will result in a noticeable reduction in eutrophication in the Housatonic lakes, with subsequent improvements in recreational opportunities. A phosphorus analysis in our 303(e) basin plan estimated that 30% of the phosphorus load on Lake Lillinonah originates from the Danbury wastewater treatment plant. Other point sources in Connecticut are minor in comparison. The DEP, the City of Danbury, and the FMC Corporation will install a temporary phosphorus system at the Danbury sewage treatment plant and operate the system for six months beginning in April. During this period, extensive monitoring of the Still River and the Housatonic lakes will be conducted to evaluate the success of this program in abating eutrophication.

Our phosphorus analysis also conservatively estimated that 28% of the total phosphorus load on lake Lillinonah during the summer months originates from sources in Massachusetts. The Pittsfield waste water treatment plant accounts for approximately 80% of Massachusetts' point source load. It is therefore possible that phosphorus removal at Pittsfield would contribute significantly to reducing phosphorus concentrations in the Housatonic lakes. We further recognize that phosphorus removal at both Danbury and Pittsfield may achieve a beneficial reduction in eutrophication that would not be realized by either system operating alone. Therefore, in order to evaluate the maximum improvement attainable through major point source phosphorus control in the basin, I request that you take the necessary steps to insure that phosphorus removal will be accomplished at the Pittsfield treatment plant for the duration of the Danbury experiment.

Very truly yours,

Robert B. Taylor  
Director of Water Compliance  
and Hazardous Substances

RBT/am

cc: Richard B. Holmes  
Pittsfield Sewer Commission



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



May 5, 1977

Ms. Leslie Carothers  
Director  
Environmental Protection Agency  
Region I  
John F. Kennedy Building  
Boston, MA 02203

Dear Ms. Carothers:

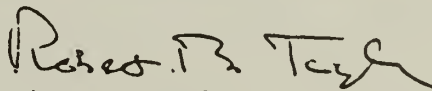
Thank you for the opportunity to comment on City of Pittsfield, Massachusetts Discharge Permit MA0101681. The State of Massachusetts through its 303(e) basin plans recommended phosphorus removal for the City of Pittsfield. At that time we supported this recommendation since our own analysis indicated point source removal from Pittsfield and Danbury (Conn.) may improve the conditions in Lakes Lillinonah, Zoar and Housatonic. These lakes presently experience dense algae blooms during the summer months, and without treatment, severely limit recreation opportunities. Connecticut's Housatonic River Basin Plan conservatively estimates that 28% of the total phosphorus load on Lake Lillinonah during the summer months originates from Massachusetts.

This Department has required advanced waste treatment for the Danbury treatment plant plus phosphorus removal for the summer of 1977. Our intent is to determine if the combined phosphorus removal from Danbury and Pittsfield (municipal treatment plant and General Electric) will have a significant beneficial impact on the three Housatonic lakes. Our comments on the Upper Housatonic 208 Water Quality Management Plan prepared by the Berkshire County Regional Planning Commission is attached. We urge and support the inclusion of phosphorus removal by the City of Pittsfield. If studies of the effect of phosphorus removal on the eutrophic condition of the Housatonic Lakes do not demonstrate that a beneficial impact can be expected, we would expect that the requirement for phosphorus removal could be relaxed in the future. Such studies are scheduled to be initiated in May of this year.

We would like to make two specific comments regarding the phosphorus removal schedule in the Pittsfield permit. The allowance for seasonal operation of the phosphorus removal facility apparently is based on the assumption that phosphorus discharged during the winter months does not contribute significantly to the Housatonic's eutrophication problems. We strongly recommend that the fate

of this "off-season" phosphorus be carefully evaluated before allowing for seasonal discharge. Secondly, we feel that the Pittsfield facility must be operated during April and May as well as June through September in order to minimize the development of summer phytoplankton blooms in Lakes Killinonah, Zoar, and Housatonic.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Robert B. Taylor". The signature is fluid and cursive, with a large initial "R" and a long, sweeping underline.

Robert B. Taylor  
Director of Water Compliance  
and Hazardous Substances

RBT/SB/am



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OFFICE BUILDING

HARTFORD, CONNECTICUT 06115



April 18, 1978

Mr. Thomas C. McMahon  
Director  
The Commonwealth of Massachusetts  
Water Resources Commission  
Division of Water Pollution Control  
110 Tremont Street  
Boston, Massachusetts 02108

Dear Mr. McMahon:

We have reviewed the November 17, 1977 draft of the Massachusetts Water Quality Standards and offer the following comments.

- 1) The Connecticut Water Quality Standards classify all waters which flow to or from the Commonwealth of Massachusetts as Class A except as follows:
  - a) the main stem of the Housatonic River which is designated Class B (note - present Class D due to PCB contamination which precludes fishing for human consumption).
  - b) all tributaries of the Farmington River which flow to or from the Commonwealth of Massachusetts are designated as Class AA (existing public water supply) with the exception of streams tributary to Sandy Brook and Salmon Brook which are Class A waters.
  - c) the main stem of the Connecticut River which is designated Class B (note - present Class C due to combined sewage overflows).
  - d) an unnamed tributary of Muddy Pond and Roseland Lake, which tributary is located in the Town of Southbridge flowing into a Connecticut public water supply and is, therefore, designated as Class AA.
  - e) the main stem of the Quinebaug River which is designated Class B (note - present Class C due to unacceptable water quality)

All discharges except minor cooling and clean water are prohibited to Class A waters. Cooling water discharges must not impare cold water fish spawning and growth. A procedure is described in the criteria which could result in an authorization for discharge, but only as a result of reclassification to Class B subject to meeting the conditions of the Connecticut antidegradation statement. The Connecticut Class A designation seems relatively consistent with the Massachusetts Class B designation provided Regulation 4.3 is applicable. It does not appear that consistency is achieved for the Scantic River (Table 28). It is, therefore, requested that Regulation 4.3 be applied to the waters of the Scantic River Basin in Massachusetts.

The above request is especially important since active plans exist to use the Scantic River above the Somersville Dam for public water supply in the future. When that plan is implemented or formalized in the Connecticut Water Resources Plan, the affected portion of the Scantic River and all tributaries will be designated Class AA effectively precluding all discharge.

- ✓ 2) With reference to the Housatonic River, it is requested that the main stem and tributaries be designated subject to Regulation 4.5. Connecticut has demonstrated that treatment of discharges to reduce phosphorus will result in a commensurate reduction of the eutrophic conditions experienced in the Housatonic lakes on the main stem of the Housatonic River in Connecticut. Therefore, we feel that dischargers to the Housatonic River system in Massachusetts should understand that phosphorus removal will probably be required in the future to improve downstream water quality.
- 3) Although we understand, as a result of previous correspondence, that the Commonwealth of Massachusetts does not intend to permit discharges which would flow into Connecticut public water supplies, we see no provisions in the Massachusetts Water Quality Standards which provides that such could not occur or which clearly places an applicant for a discharge permit on notice that such restrictions exist. It is, therefore, requested that appropriate revisions be incorporated in the standards to insure the continued protection of Connecticut public water supplies which originate, in part, in Massachusetts.

The waters affected by the above request are identified in paragraphs 1(b), 1(d), and, in addition, that portion of the Scantic River system where water supply development is planned as discussed in the last paragraph of Section 1 above.

- 4) Lastly, we would like to go on record as strongly endorsing the designation of the French and Quinebaug Rivers as Class B. As you are aware, the U.S. Environmental Protection Agency and our department have documented that a minimum of Class B quality must be achieved in the Massachusetts portion of the French and Quinebaug Rivers if water quality consistent with Class B is to be achieved downstream in Connecticut. Only through the installation of advanced waste treatment facilities at Dudley and Webster can the goal of meeting the adopted water quality class be achieved. We are aware that some opposition exists to the Class B designation you propose. We feel it would be totally inappropriate for the Commonwealth of Massachusetts to fail to pursue the goal of Class B water quality.

Thank you for the opportunity to comment.

Very truly yours,

*Robert B. Taylor*

Robert B. Taylor  
Director of Water Compliance  
and Hazardous Substances

RBT/am

## SOURCE OF COMMENTS

State of Connecticut

Department of Environmental Protection, Stanley J. Pac

## RESPONSE

The results of the recently completed 201 combined sewer study for Great Barrington have been incorporated into Chapter H of the Final Plan/Environmental Impact Statement. The plan recommends a partial sewer separation project which will eliminate combined sewer overflows, and an urban runoff control program to reduce the remaining stormwater impact on the river.

The proposed Pittsfield STP effluent by-pass of Woods Pond should not be considered as a recommendation which would seriously compound the existing eutrophication problems in the Connecticut main-stem impoundments. As pointed out in section 4.0 of Chapter G, control measure (5), phosphorus removal at the Pittsfield STP is not expected to significantly affect the Connecticut impoundments, partly due to the attenuation of phosphorus in the river by sedimentation and biological uptake. The effluent by-pass would not utilize the trapping efficiency of Woods Pond (recognized in Section 5.0 of Chapter G), but substantial attenuation is still expected to take place in the more than 100 river miles from the effluent by-pass outfall and the Connecticut lakes.

The 1975 Connecticut 303 (e) Housatonic River Basin Plan, on page 76, states that "During the summer months, point sources in Massachusetts account for 28% of the total phosphorus load to Lake Lillintonah". The Basin Plan apparently overlooks the nonpoint sources of phosphorus in Massachusetts, since page 71 of the Basin Plan identifies this 28% of the total load to the lake as phosphorus "from Massachusetts". Failure to consider nonpoint phosphorus sources in Massachusetts may have lead to a false impression of the effectiveness of Massachusetts point source phosphorus controls.

Until more work is done to quantify the impact of the Pittsfield STP on the Connecticut impoundments, phosphorus removal at the Pittsfield STP should not be considered as being a significant part of the solution to the Lake Lillintonah eutrophication problem.

Chapter G of the 208 plan has been expanded to note that resolution of the Pittsfield phosphorus control issue is expected to take place following analysis of the water quality data collected during the summer of 1978.

LOCAL

PUBLIC COMMENTS - STOCKBRIDGE MEETING 3/28/78

1. James Kiley, Chairman, Board of Selectmen - made a statement saying that the Selectmen have consistently supported the wishes of the town concerning discussions of the treatment plant issue. He then read the various town votes concerning the treatment plant issue.
2. Francis Pilling, Chairman, Board of Health - read the attached statement from the Tri-Town Health Department
3. Joe Kruger, President, Stockbridge Bowl Association - stated sewers are needed around the Bowl for health reasons.
4. Nabih Nejaime - stated that it will be difficult to enforce the management of septic tanks and that the methods described are too short term. The town has a moral obligation to the lake residents. Sewers will provide a long term solution. He suggested a similar forum for questioning the other (201 program) side of the story. Now this project will only cost 1.8 million dollars, later it could be \$18 million.
5. Al Schuler - The 1.8 million dollars is only for the treatment plant, not the whole system.
6. Mary Flynn - We as lay people are unable to make a decision. The Federal and State governments have funded 2 different studies (201 & 208) which appear to be 2 sides of the same coin. We should get BCRPC and Whitman and Howard studies together, form a comprehensive plan, and investigate funding for it. There are virtues in both the 201 and 208 plans.
7. Jack Spencer, Chairman, Planning Board - asked if the Town's 2½ acre zoning district around Stockbridge Bowl be endangered by a sewer line in the area. Asked about the growth impacts for the Bowl area and for the town in general.
8. Anthony Murad, Building Inspector - stated that he is concerned with the adequacy of the sampling and research done. Rather than spending alot of money talking to people about an impressive looking report, more money should have been spent on basic data collection. He is concerned that cursory research and personal opinions appear in the report as conclusions. Feels that the report confused the townspeople by interjecting the sewer issue to too large an extent. Report appears to be based on skimpy information. Town wants more sound, factual information. For the price of the study - go out and get the facts. Many of the conclusions are stock answers from the shelves of the Center for the Environment and Man, Inc. Feels that the town will not go for large scale growth with or without sewers. Stated that if phosphorus from septic tanks is not a major issue, then why do we need a phosphorus control program. Stated that the nutrient totals from agricultural appears too high because there is only one source. Stated that he sees not much fact finding about actual conditions near the lake. Feels that the report is not very substantial.

9. Don Davis - Asked for information on the number of houses in the Stockbridge Bowl area. Stated that Beachwood is a very big trouble spot for leaking septic systems.
10. Richard Derossier, Whitman and Howard - Questioned what information had BCRPC taken from Whitman & Howard reports with respect to costs.
11. Joe Nejaime - We need long term solutions. The cheap measures are what have caused our present problems.
12. Margaret Gray - concerned about the costs to the individual homeowner. Especially hidden costs not shared by the Federal and State such as maintenance, running the treatment plant, user fees, etc. No one is telling the voters how much this all costs.
13. Terry ? - Asked about the total, local and individual homeowner cost of 208 and 201 projects.
14. Ray Brinker - Wanted to know what guarantees there are that 208 will work. Stockbridge is not declining in population - it's growing. All small towns "around here" needed sewers 30 years ago.
15. Mary Flynn - 208 is valuable and necessary whether or not be build sewers. It covers environmental, peripheral areas that need to be addressed.
16. James Kiley, Chairman, Board of Selectmen - Selectmen agree with many (not all) aspects of the 208 plan. But town is on a court-mandated schedule to upgrade the existing treatment plant. The design must be approved by 8/15/78.

*Read  
out  
no*

**TRI-TOWN HEALTH DEPARTMENT**  
**LEE - LENOX - STOCKBRIDGE**

*Read  
Mar 28, 1978*

Lee, Mass., March 28, 19 78

Stockbridge Board of Health  
Town Hall  
Stockbridge, MA 01262

Gentlemen:

I apologize for not being present for the Stockbridge Summary of the 208 Water Quality Plan hearing. I am unable to cancel a previous commitment. However, I do wish the Board of Health to read this letter during the meeting. As Tri-town Sanitarian I believe that the 208 study does not address nor meet the needs of Stockbridge for two major reasons, as follows.

- hr*
- I. The study states that health problems have not been documented I must totally disagree with this statement. Not only do we have documented health problems regarding failing septic systems but it is common occurrence especially in the Beachwood area of Stockbridge Bowl. I might add that I do not recall anyone from the Berkshire County Regional Planning Commission requesting an appointment with me to discuss these problems. Last year alone I recorded at least fourteen (14) health hazards in and around Stockbridge Bowl that were a direct result of the septic systems not functioning, and this Department as well as the Board of Health are aware of many more that we just have not had the time to investigate. Of the fourteen (14) failing systems twelve (12) of these areas were unable to meet Title 5 of the State Environmental Code. (Minimum Requirements for the Subsurface Disposal of Sanitary Sewage) Four of the known health hazards have not yet been repaired and all of the systems that were repaired or replaced resulted in extremely high costs to the owners due mainly to the severe limitations for subsurface sewage disposal. This leads me to the second objection I have regarding the 208 study.
  - II. The study suggests or recommends that septic systems near the lake be strictly managed. I am not exactly sure what they mean by this statement, but I do know that the majority of areas surrounding Stockbridge Bowl have such severe limitations that a feasible plan (economic/ physical) to maintain septic systems so as not to create a health hazard is nearly impossible.

To give you an idea of the costs involved, the amount that only two (2) of the Stockbridge Bowl residents had to pay for only replacement or repair of their subsurface sewage disposal systems was in the vicinity of eleven thousand dollars. (\$11,000.00) This does not involve periodical pumping of the systems as one of the installations was a holding tank and the owner must keep pumping the tank out. These prices are not exaggerated and I am sure the owners would verify the estimates. More over they are not isolated cases, we have many cases where owners have had to pay extreme amounts of capital to repair or replace their sewage systems. Again this is mainly due to the fact that there are extreme limitations and Title 5 of the State Environmental Code must be complied with.

# TRI-TOWN HEALTH DEPARTMENT

## LEE - LENOX - STOCKBRIDGE

Lee, Mass., March 28, 19 78Page 2

I was also able to obtain approximate figures from one area septic tank pumping company that serviced the Stockbridge Bowl area over the last year. The figures for 1977 for three (3) of their routine customers that have holding tanks and only seasonal use. The cost for pumping only was approximately seven hundred dollars. (\$700.00)

The normal price for pumping septic tanks is approximately forty to fifty dollars, (\$40.00 - \$50.00) for the first 500 gallons and two and one half cents (.02 1/2) per gallon for anything over that amount. Also there is an additional fee for uncovering the tank of six to eight dollars. (\$6.00-\$8.00) This company services the majority of the Beechwood area of Stockbridge Bowl and pumps the septic tanks a minimum of one or two (1-2) times per season.

I must also question the section in the report which suggests, "the building inspector should continue to make sure septic systems are designed and built to conform with state and local environmental codes" and that "A regular inspection and pumping program should be established, and failed systems should be dealt with on a case by case basis". Is this a new responsibility for the building inspector? I was totally unaware that septic systems and the operation and installation thereof were under his jurisdiction. However, I will inform them that I as representative for the Boards of Health for the towns of Lee, Lenox and Stockbridge have assumed and performed the responsibilities as described above.

I must also assume that the Berkshire County Regional Planning Commission does not totally understand the implications of Title 5 of the State Environmental Code. (Minimum Requirements for the Subsurface Disposal of Sanitary Sewage) I am attaching a copy of Title 5 in case they do not have one available.

Finally I would be happy to meet with anyone from the Planning Commission who may be in disagreement with any of the facts in this letter. In fact I would gladly give a guided tour to anyone that questions our present health related problems due to failing septic systems.

The State Department of Environmental Quality Engineering out of Amherst should also be allowed to comment and make recommendations regarding this report. They too are well aware of the glaring limitations for subsurface sewage disposal at Stockbridge Bowl.

Enclosed is additional information that I hope will be of help and in closing I strongly suggest investigating the use of water saving devices (toilets, showerheads, urinals, etc.) for sewered as well as unsewered areas.

Yours truly,  
*Peter J. Kolodziej*  
Peter J. Kolodziej  
Tri-town Sanitarian

PJK:new

Delivered by Francis L. Pilling  
79 down / Stockbridge Bd / Health

PUBLIC COMMENTS - GREAT BARRINGTON MEETING 4/3/78

1. Charles Castronova - Chairman, Board of Selectmen - Asked about funding for sewer separation project, eligible and ineligible costs. Wanted to know if 208 plan would provide additional funds for the town.
2. John Tuller - Stated that town's engineering consultants recommended the opposite from the 208 study regarding septage disposal. The plant could not handle the wastes from other communities. Constructing additional facilities at the site would be very difficult due to limited land area and possible neighborhood impacts. He then described the current septage disposal system in Southern Berkshire County (hauling and disposal in Connecticut) and asked what other septage disposal options had been investigated.
3. -- ? - Stated that it was very confusing to the laymen to have conflicting advice from different engineers. He said that this had happened in Stockbridge too and asked what could be done about it.
4. John Mooney - The 208 study and Tighe & Bond do not appear to be that far apart about using the Great Barrington plant for septage disposal. Both agree that before it can be used as a regional facility, new construction is needed. Maybe after the sewer separation project, the plant would be better able to serve as a regional septage disposal facility.
5. George Ladd - Planning Board - expressed an interest in the recommended ground-water protection guidelines. Would like more information about Section 208, mapping of aquifer recharge areas, and ways to include this in the town's zoning by-law.

PUBLIC COMMENTS - LENOX MEETING 4/4/78

1. George Wislocki - Berkshire Natural Resources Council - wanted to know if projects recommended by the plan would be exempt from additional environmental impact analysis. Especially concerned about the so-called Woods Pond By-pass.
2. Warren Archey - Chairman, Lenox Planning Board - asked if the loss of the natural attenuation and filtering properties of the Woods Pond area had been considered in evaluating the by-pass option. Asked about operating costs of river clean-up options and the status of the option for removing Woods Pond dam.
3. John Pignatelli - Lenox Selectmen - stated that Lenox has always taken its pollution clean-up responsibilities seriously. Believes that pollution problems can be solved and the river restored. Questioned the way in which data was collected for the study, especially for Stockbridge.
4. Wayne Weatherhead - Lenox Sewer Building Committee - sludge handling costs are estimated at \$300,000, not \$30,000 as in the "208" report. Town's engineering report, completed 10 months ago concludes that it is not cost-effective to correct infiltration/inflow problems. Does not want the 208 plan's recommendations to correct it to show up as a requirement for the town. Also, questioned the need to spend a lot of money to do the last bit of water cleanup for a small stretch of the river (Woods Pond).
5. -?- Question about funding for collector sewers and 208/201 relationships.
6. George Wislocki - Woods Pond by-pass option lacks realism, improvements to the Pittsfield treatment would be better.
7. Sally Bell - Also concerned about the recreational and wildlife impacts of removing the Pittsfield treatment plant effluent from the river segment through Woods Pond.
8. Bill Enser - Lee Conservation Commission - asked about the additional treatment that would occur in the bypass pipeline.
9. George Darey - Lenox Selectmen - emphasized that land has been acquired for passive recreation along Woods Pond. He is very concerned about the environmental impacts of the bypass option, both on Woods Pond (reduced flow of water) and on downstream areas (shifting the point of effluent discharge).

10. Frances Paddock - President Housatonic River Watershed Association - asked how and where the pipeline construction would occur. Expressed concern about the construction impacts on the Woods Pond environment.
11. George Wislocki - Wanted to know if better management of the three existing impoundments (lakes) was considered as a way to obtain water for low flow augmentation.
12. Bill Enser - Asked about the changes in temperature gradients in Laurel Lake that would result from the proposed aeration system.
13. Edgar Hover - Mass. Division of Fisheries and Wildlife - Also concerned about possible impacts of bypass option on Woods Pond wildlife management area. No one is a greater advocate for clean water than he is, but maybe a little dirty water here and there might be a benefit in other respects.
14. George Darey - Recreational use of Woods Pond bypass pipeline right of way would not be desirable, people like the area just the way it is now.
15. George Wislocki - agree with George Darey about the Woods Pond area, but other trunk line right of ways, especially in Pittsfield, should be made available for public use.

PUBLIC COMMENTS - MONTEREY MEETING 4/5/78

1. Fred Vorck - President, Lake Buel Association - asked about status of Monterey's application for harvesting equipment under Section 314 of the Clean Waters Act and the status of the 314 program.
2. Richard Tryon - Monterey Selectmen - asked about how the aquifers on the map had been selected and if others, such as Gould Farm area, had been considered. Concerned about the possible water contamination from the town's landfill, especially PCB's.
3. Jed Lipsky - Monterey Planning Board - made a motion that the state issue a report on the PCB issue in the 208 area, and that specific data be collected in Monterey.
4. Eugene O'Connell - Monterey Moderator - asked if the quarter mile or so between the landfill and the Konkapot was a safe distance in terms of PCB's, and what the cost of PCB studies might be. Also asked for more explanation of the lake drawdown technique.
5. Tony Reed - Asked if it would be beneficial to clear out dead weeds and bottom muds when the lake is drawn down.
6. Mark Miller - Berkshire Eagle - Asked about the effects of drawdown on the fish population.
7. Margaret Vorck - Our hands are tied without state or federal help for lakes. Summer people may take drastic action, such as herbicides, to make the lake useable.
8. Fred Vorck - The plan is wonderful, but we need funds to take corrective action, and soon. Lake association is losing patience with delays in getting solutions put into effect.
9. Margaret Vorck - Lake Buel needs a dam or some other way to control the water level because of flooding problems.
10. Richard Tryon - An intensive letter writing campaign should be organized to inform Congressional appropriations committee about the need for lake management funding.

PUBLIC COMMENTS - LANESBOROUGH MEETING 4/6/78

1. Ron Tinkham, Chairman, Board of Appeals - Add (to the sewer construction program) the cost of water line replacement which will be necessary as the streets are dug up to install the sewers. Asked if the Town would be better off with public ownership of the water system in terms of operation and obtaining grants. Expressed concern about the adequacy of the sewage disposal system for the Zucker Project.
2. Bert Robinson, Board of Selectmen - Questioned the septic system setbacks from lakes recommended in the plan (100' for cottages, 200' for houses.) Because of the conversion from seasonal to permanent use, one number should be applied to all dwellings.
3. Harley Phelps, Finance Committee and Chairman, Conservation Commission - The costs for harvesting appear to be only half of the true costs because of the problems of disposing of the harvested weeds.
4. Walter Dojka, Health Inspector - Noted the decline in fishing and other adverse effects of the chemical treatment for weeds in Pontoosuc; discussed problems with sediment build up on the lake.
5. - ? - - Question about dredging benefits, costs and environmental impacts.
6. - ? - - Noted that the weed problem has developed only in the last 15-20 years, and asked about the reason for it.
7. Harley Phelps - Asked if the 208 plan reflects the 1977 Clean Water Act amendments, especially the sections dealing with authority for nonpoint source control.
8. James Darocha, Conservation Commission - Asked about biological control for weed problems, especially fish.
9. Bert Robinson - Wanted to know reasons for recent weed growth at Berry Pond, even though there have been no changes in the watershed. Felt that lake management specialists don't have all the answers, and we shouldn't go ahead with expensive control programs until we really know what's going on.
10. Ron Tinkham - Questioned the accuracy and adequacy of the aquifer recharge area mapping; the final plan should note this concern.
11. Raymond Hospot, Chairman, Finance Committee - Wanted to know what percentage of the \$52 million areawide program would actually be implemented.
12. Mark Phelps, Planning Board - Wanted to know how or why the Town of Lanesborough would take action on restoration of Pontoosuc Lake when the lake is owned by someone else.
13. Norm Auger, Chairman, Board of Selectmen - Stated his concern about the continuing expense of lake management as well as the initial costs of the programs.
14. Barbara Graham - Asked about the effects of erosion on the lake, especially from severe areas such as under the power lines near Secum Brook.

PUBLIC COMMENTS - PITTSFIELD MEETING 4/10/78

1. George Wislocki, Berkshire Natural Resources Council - Questioned the basic purpose of the so-called "Woods Pond effluent by-pass"; expressed concern about reducing the flow of water through Woods Pond; proposed better management of upstream impoundments (Onota Lake, Pontoosuc Lake, and Richmond Pond) to obtain water for the river during low flow conditions. Also stated that Woods Pond is acceptable as is to many environmentalists and further clean-up should be a low priority statewide.
2. Tracy Noonan - Asked about the downstream effects of the Woods Pond effluent by-pass.
3. Leo Daly, Mass. Division of Fisheries and Wildlife - Asked why the dissolved oxygen for Woods Pond is 5 mg/l when only warm water fish can live there and they require only 3 mg/l.
4. Joel Gordon, Pittsfield Wastewater Treatment Plant - Asked about the additional treatment that would be required to meet water quality standards, and asked about the details of the effluent by-pass proposal.
5. George Wislocki - Spoke in favor of considering an increase in the Woods Pond dam elevation to offset the reduced flow resulting from the Pittsfield treatment plant effluent by-pass.
6. George Wislocki - Expressed concern about the Blythwood Drive sewer recommended in the 208 plan because of its potential for encouraging growth and the impacts of this additional growth on Onota Lake.
7. Al Turner, Pittsfield Planning Board Staff - Read a position statement on the Blythwood Drive sewer from the Pittsfield Planning Board. (Attached)
8. George Wislocki - Requested that the potential advantages of pressure sewers for situations like Blythwood be described in the final plan.
9. Lou Bolduc, Pittsfield Health Commissioner - Stated the Health Department's support for sewerage, and clarified the City's policy for using Onota Lake as an emergency public water supply.

CONCERNS OF THE PLANNING BOARD  
ON THE SEWERING OF BLYTHEWOOD DRIVE

1. Sewering is not the most effective way of controlling the pollution or advanced aging of Onota Lake in the Blythewood Drive area. (B-4 "208")
2. Sewering of the Blythewood Drive area may actually increase the "non point" source of pollution to the lake by encouraging more development of greater densities (pg. 27 CDM 1976 Red Book) (and pg. 37)
3. The report entitled, The Upper Housatonic "208" Water Quality Management Plan, Phase I, November 1976 indicates that sewerage of most lake areas is the least cost effective method of phosphorous control which the report lists as the critical nutrient or pollutant of lakes.
4. The destruction of the shore line area during construction will cause erosions and siltation of the Onota Lake shore line into the lake which will reinforce the weed population. (Pg.36 Red Book)
5. Existing feasible alternatives to control phosphorous into the lake could accomplish as much as sewerage at a fraction of the cost, use of non phosphorous detergents, erosion control, managing the use and disposal of manure, are examples of these alternatives.
6. Although the sewerage of Blythewood Drive would eliminate any health problems in the Onota Lake area from fecal pathogenic organisms and bacteria leaking out of failing septic systems, sewerage would not significantly control the flow of weed producing nutrients to the lake.
7. The "208" Phase I report and the Camp, Dresser and McKee, Inc. report both recommend the sewerage of Blythewood Drive because of the possible health problems from leaking septic fields but also state that lake management techniques are needed to control weed growth.
8. The Blythewood Drive sewer depends on electric pumps that could fail mechanically or stop from a power failure in the area which would result in a possible overflow of sewage into the lake. (Pg. 35 CDM book)

The latest report of lake pollution entitled "The Upper Housatonic "208" Water Quality Management Plan Phase I Report dated November 1976 states that phosphorous is the critical nutrient for weed growth in Onota Lake. This report also states that Erosion, not septic systems as many believe is easily the principal cause of eutrophication which results in weed growth.

Phosphorous supplied to the lake from failing septic fields must be controlled either by controlling development, by a septic system management program, or by sewerage.

Possible alternatives to sewerage of Blythewood Drive (Pg. B-11 "208")

1. Zoning to insure that future development is controlled to a density that the existing soil conditions can accomodate septic field.
2. Building permits issued only upon satisfying compliance with percolation standards and property conductor tests and a provisions for a second on site backing field should the first fail.
3. recurring inspection of septic systems.
4. In the case of septic field failure have provisions for restrictive solutions in lieu of forced abandonment of the site.

Other causes of eutrophication or weed growth (Pg. D-1 "208")

1. erosion from areas draining to Onota Lake via streams and brooks. This can be best demonstrated by the amount of weed growth in the northern part of the lake.
2. Sanitary waste from live stock ie dairy cows in the northern drainage area of Onota Lake. (Pg. 10 Red book)
  - a.) dairy cows produce about twenty times the sanitary waste of a human .
  - b.) a herd of 450 dairy cows is roughly equivalent to a town of 9000 people.
3. fertilization of lawns and pastures.
4. domestic pets.

PUBLIC COMMENTS - LEE MEETING 4/11/78

1. Jim Kuneman, Planning Board - Asked how the curves for dissolved oxygen in the river were developed.
2. John Herbert - Asked how the different phosphorus sources for Laurel Lake were identified.
3. Jim Kuneman - Wanted to know the reasons for a projected increase in erosion related phosphorus sources within the Laurel Lake Watershed.
4. Ron Thompson, Soil Conservation Service - Advised caution in using the universal soil loss equation in calculating the amount of sediment delivered to the lake.
5. Frank Foley - Recommends sewerage for Laurel Lake.
6. John Herbert - Has seen sewer pipes leading directly into the lake; most of cabins are in Lenox; and that sewage can be seen running into the lake.
7. Jim Kuneman - Questioned the calculations of effectiveness of lake management techniques, especially the septic system management program.
8. Joe Moynihan - Stated that the costs for the septic system management program are too low, based on recent costs of replacing septic systems in this area.
9. Frank Foley - Noted the 500' setback for septic systems from major water bodies in Lee.
10. Peter Scolforo, Public Works Department - Asked if the failing septic systems in Lenox had been considered in the sewerage section of the plan.
11. Bill Enser, Tri-Town Health Department - Expressed concern for the possibility of septic system failures in the future also.
12. George Wheeler, Public Works Department - The 208 plan should show sewerage in the Lenox portion of the Laurel Lake watershed.
13. Frank Foley - Lenox should also adopt zoning by-law and subdivision restrictions around Laurel Lake that are similar to those adopted by Lee.
14. Bill Murphy, Board of Selectmen - Wants to know what Lee can do to make Lenox eliminate its pollution sources that are affecting Laurel Lake.
15. Jim Kuneman - The 208 plan analyzes the lake on a regional basis (the watershed), but the implementation and management of the plan is left to the local governments. Regional implementation authority is needed.
16. Bill Enser - Spoke in favor of harvesting as a lake management technique for Laurel Lake.

17. Bill Powers, Chairman, Conservation Commission - Noted that the Orchard Street, Willow Creek, East Lee and South Lee sewer projects recommended in the plan are now under construction.
18. Frank Foley - Emphasized the need for regional approaches to lake management.
19. Jim Kuneman - Asked about the details of the recommended septic system management program.
20. Bill Enser - Stated that the cost for septic system management listed in the 208 plan are too low.
21. George Wheeler - Noted that the town had undertaken groundwater investigations in the Greenwater Brook aquifer and that a report would be prepared soon.
22. Jim Kuneman - Asked about the methods and inflation factors used to project future costs.
23. Bill Powers - Expressed concern about the safety of the Woods Pond effluent by-pass if there is a malfunction at the Pittsfield treatment plant.
24. George Wheeler - Pointed out that an engineering report has shown that the Lee landfill is not a threat to the Lenoxdale aquifer. The 208 plan should be changed based on the results of this study.

PUBLIC COMMENTS - DALTON MEETING 4/12/78

1. Fred Crane, Crane & Company - Although the recommended \$6 million "Woods Pond bypass" appears to be the best of the options for the river, the money could be better spent where people will actually swim. Also, the area is an important wildlife resource in its present condition and further water quality improvements won't add much to it. (Also submitted written comments - attached.)
2. Mary Jacobsmeyer, Finance Committee - Asked if new dams proposed for flood control might have adverse effects on water quality, especially if stream flow is reduced during low flow periods. -
3. Fred Crane - Does not believe that the technology now exists for Crane and Company to reduce discharges to meet the proposed federal limits for 1983. Curtailment of production appears to be the only way to meet the limit. Supports the 208 plan's findings that costs would be extremely large and benefits to the river would be extremely small.
4. Tom Callahan, Board of Selectmen - Overall, very much pleased with the work done on the 208 plan. Also, wanted to know about the possibilities of funding for sewers in the Route 9 area (construction of the Wahconah Brook interceptor, from area west of Orchard Street to the Route 9 & Anthony Road intersection).
5. Cliff Green, Conservation Commission and Planning Board - Made corrections to sewer service map; existing sewer area should include: Housatonic Street from Depot Street to East Street, and the Tower Road and Sunnyside Drive area.

April 12, 1978

TO: Berkshire County Regional Planning Commission

I would like to call your attention to an error in your report. In the references to the industrial waste from Dalton, the report states that Crane & Co. is expected to spend \$1.5 million to meet the current standards.

The actual conditions are that Crane & Co. has been meeting the current standards since December 1976. The evidence for this statement is in the monthly reports to EPA.

Crane & Co. would appreciate the correction in this matter.

F. G. Crane, Jr.

PUBLIC COMMENTS - HINSDALE MEETING 4/13/78

1. James Quillard - Asked if the 1983 target date for sewerage of Ashmere Lake and Plunkett Reservoir would mean that no work would start until 1983.
2. Stephen Demski, Curran Associates - Explained the design status and funding status of the town's sewerage projects.
3. Louis Carmel, Building and Health Inspector - Asked what effect the inclusion of the town's sewerage projects in the 208 plan would have in terms of funding priorities. Also, asked about the effects on Woods Pond of the proposed Pittsfield treatment plant effluent by-pass, and expressed concern about the added costs to Hinsdale resulting from expensive programs such as phosphorus removal.
4. Guy Weston, Plunkett Lake Association - Commented that the annual lowering of Plunkett Lake (6'-8') has been very effective in controlling weed growth.
5. Louis Carmel - Asked for information on how the population projections were made and where within Hinsdale the growth was expected to occur. Commented that there is little developable land in Hinsdale.
6. Peter Blake, Board of Selectmen - Asked if the many dams on the river are an advantage or disadvantage in terms of oxygen in the river.
7. Winston Saville, Massachusetts Division of Fisheries and Wildlife - Wanted to know if the so-called "Woods Pond" by-pass would receive a high priority for state and federal funds. Stated that Woods Pond is an extremely important wildlife resource and environmental impacts of any activity should be carefully considered.

In terms of alternatives for low flow augmentation, the planners should be aware that many potential impoundments sites are important wildlife management areas, especially the area known as the Hinsdale flats.

Also, asked about the status of PCB studies.

April 7, 1978

RECEIVED

Berkshire County Regional Planning Commission  
10 Fern St.  
Pittsfield, Mass. 01201

APR 10 1978

Attn: Richard Holmes:

BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION

I wish to write and be recorded as one who disagrees and is dissatisfied in the 208 Report and particularly the Stockbridge Summary. (As presented in Public Hearing on Tuesday March 30 th.)

I am a resident owner in the Beachwood area of Stockbridge Bowl. I have had a cottage there for thirty years. During this time I have seen much growth and several changes. Currently I am President of the Lenstock Association of owners in that area.

There have been countless meetings over the years in which we have discussed weed control, road conditions, health problems due to leaking septic systems, etc. We have used a variety of methods in our own area such as weed cutting-barge system, pulling weeds by hand with hired divers etc. Most effective to date is the chemical treatment.

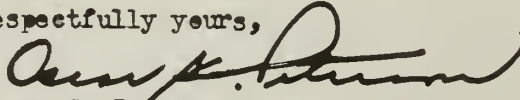
We have yet to have successfully demonstrated the plan of lake lowering and weed freezing. This cannot be done due to lake controls at outlet and insufficient depth.

I know that any water tests taken during the summer of 1977 were not properly done by the youths employed etc.

Most residents agree that it will be much better to support and bear the cost of a sewerage system over the years - than to make heavy payments for annual storage and pumping of waste.

The plan as presented by your commission runs counter to the real needs of sewerage and health precautions and I intend to promote as much as possible the 201 sewerage plan.

Respectfully yours,



Oscar G. Peterson

Beachwood cottage 238

Home or winter residence- 81 Appleton Ave.  
Pittsfield, Mass.  
01201

RECEIVED

APR 4 1978

BERKSHIRE COUNTY

RECEIVED BY THE COMMISSION

Lenox, MA 01240

3 IV '78

Berkshire Co. Regional Planning Commission  
10 Fenn St., Pittsfield, MA. 01201  
Attn. Richard Helms, Project Manager.

DearSirs:

At the Stockbridge Planning Board hearing on March 28th at Town Hall, those in attendance were asked for comments or questions at the conclusion of the presentation. As past president, and long re-tread president of the Stockbridge Bowl Assn, owner of property on the lake, member of the Growth Committee of Stockbridge, past Secretary of the Stockbridge Conservation Commission, and past member of the Sewer and other town committees, I had my hand up at the outset. It continued up until the end of the meeting, without success to seek an opportunity to speak.

It had been my intention to express appreciation of the new insights provided by your study and the attractive way it had been presented in printed form. I had also wanted to suggest the 201 and 208 studies seemed on parallel tracks without the real reason being given as to why, after nearly fifteen years of concern and discussions over the health problem, as distinct from the clear water of the lake issue, the town had finally strongly voted to have a serious study made of the sewer problem. (At first it was limited to the Bowl, and to updating the antiquated central system. Then it was extended to include Glendale and the Goodrich areas.)

A. My enclosed letter to the Eagle resulted after the astonishing discovery that contrary to the assurance I had recieved after the close of the meeting, your committee did not have a copy of the limited written comment made by the Tri-town Sanitarian when he could not attend the meeting. It was read in part at the meeting by the Chairman of the Board of Health. Maybe it had been the intention to get it later.

B. Reading the twelve page Stockbridge Summary to the report since the meeting, however, I would also like to indicate that your study does not take into consideration the crowded conditions on the East side of the lake. Most of the summer houses--some now being winterized for year round use--and their sewer systems average well over 40 or 50 years in age. Most of the present houses and their septic systems are less than 50 feet from the lake edge. There are no areas around the lake edge for the suggested future developments. At high water each year, all the septic systems in the thickly built Beachwood area in the South-east corner of the lake, next the town bathing beach, are apt to be underwater.

C. Our Stockbridge Bowl Association board members spent a great

deal of time, some ten or fifteen years ago studying the weed control question. Records of the Association show that the harvesting plan which you advocate, was considered among other plans at great length. We found, as in the case of Lake Buel where it had been tried, that that system was completely inadequate.

D. Your suggestion of lowering the lake to freeze the weeds was also considered. This is simply not possible. The nature of the outlet of the lake is such that unless a channel is dug the lake can not be lowered more than a probable two feet. A ditch would also run into difficulties where the two Tennessee Gas Lines cross the outlet and which are just below the surface of the channel bed. Five feet would not be adequate. The success of such a plan carried out at eight to ten feet would be uncertain as weeds will grow at a depth to which light can penetrate through the water to the bottom.

(B, 1) Incidentally the height of the lake was established by court order, as reported by Prof. Middlebrook some years back in the Eagle. In the early twenties after a very expensive legal battle between two millionaire owners of property on the lake. This question should be gone into with some care before any attempt is made to tamper with the lake level for any purpose.

E. Removal of deciduous trees and shrubs from the lake edge and its tributaries <sup>suggested at the meeting, and</sup> which were reported as a major source of the nutriment problem would be impossible. So would the suggested attempt to require people to give up detergents.

No wonder Anthony Murad, property owner, past president of the Bowl Association and Town Building Inspector was disturbed (Eagle Mar. 29th). It is a regret to me that those who worked in bringing out your report should not have fully explored the knowledge, experience, and judgement of not only the Tri-town Sanatarians, and the Chairmen of the Board of Health of Stockbridge, but of many who have given this problem a great deal of concern and serious study over several decades.

Most sincerely,



John Davis Hatch

cc: Chairman:

Board of Selectmen, Stockbridge  
Board of Commissioners, Berkshire County  
Stockbridge Bowl Association

7 JOSI Rd.  
Lenox, Ma.

BCRPC  
10 Penn St  
Pittsfield, Ma.

Dear Mr. Holmes,

This note concerns  
the controversy created  
at the Stockbridge  
hearing of your 208  
report vs. the Engineers  
201 report. My under-  
standing of your report  
was that you were

never authorized to  
examine the problems  
or quality of the town  
drinking water.

Why was this subject  
made a main issue  
at the public hearing?

If I am right about  
my understanding  
why hasn't the  
BCRPC issued a  
statement via The Eagle

RECEIVED

APR 5 1978

BERKSHIRE COUNTY  
REGIONAL PLANNING COMMISSION

explaining ~~that~~ its  
objective? Why do  
you state that you  
need to address  
all major water quality  
problems. Doesn't  
this encompass  
drinking water?

Please try to  
clear up this matter  
for many concerned  
citizens - Sincerely,  
Cecile Zuckerman

Housatonic River

PRA Notice of Intent to File an EIS

BCRPC 208 Water Quality Management Plan EIS

RECEIVED

Sandra G. Johnson PRA

County Commissioners Berkshire

Ron Thompson US SCS

Robert E. Mendoza US EPA

Ed Bogdan Qual Env Plng Co

A. Stracuzzi Pres Cncl Ptfd

F. Chichetto Jr Cncl Safety Ptfd

G. Hamilton BCC/HRWA

Kathleen Green Berk Cy Hist Soc

Karl Hekler BCRPC

Paul Brindle Mayor Pittsfield

Robert Martin US Corps Engrs

Evelyn Murphy Mass. Env Affrs

Franklin Controy Chmn Conc Com Ptfd

R. Jakubowicz Cncl Cons Com Ptfd

G. S. Doyle DPW Ptfd

S. A. Conte US Rep

The enclosed response is an effort to crystallize, correlate and extend specific parts of the present comments issued by PRA, BCRPC and the media public information about the US Corps flood study. Also included are remarks to confirm data taken by interview on the BCRPC Report by Bill Muzzo and the suggestion to include some provision for the historical site seekers to participate.

*Lon Nordeen*

Lon Nordeen

129 Danforth Av.

Pittsfield, Ma. 01201

3 July, 1978

PPA Notice of Intent to File EIS 1 June 78 Sandra G. Johnson

The 1 Feb. 78 City Council meeting of the whole allocated \$54,000 for a dike on Turner Av., removing ledge and sediment from the Telelec dam upstream to above Linden St. bridge and lowering the spillway of the Telelec dam  $1\frac{1}{2}$  feet.

Presumably at or subsequent to the conference with Gerald S. Doyle THAT work now excludes the dike at Turner Av. and increases the lowering of the spillway at Telelec.

Missing from the Intent Notice is the sediment removal at \$15,000 ELSEWHERE on the river and the \$6,000 for general work also allocated at the 1 Feb. 78 Council meeting.

Comments:

The small dams are in fact oversized catch basins that exist. They act as back up beyond the storm drain catch basins. Pittsfield is rather unique in having several of them. They are closer to the accumulation of lead, phosphorous and other pollutants from the urban roadways than any retention dam in the hills.

To dredge upstream of Telelec will be useful for more water and its temperature for a better quality of fishlife. The debris between Columbus Av. and Linden St. is significant. (It is a curiosity as to how a 90 foot dragline will be used in these close quarters).

The blasting of ledge in the area proposed is an unknown. The North bound flow of water when the footings for Geller Auto Parts were placed, the sunken street and bus depot floor a few years back and the already cracked foundation of the new Aggie bank suggests caution.

If it is possible, the lowering of the spillway of the present bypass of the dam is desirable rather than the dam itself and that be restricted to the original  $1\frac{1}{2}$  feet.

PRA cont'd

If the streambed and the spillway are BOTH lowered 3 feet, there is no net gain for fishlife, boater or delay time in runoff for everyday storms.

In major flood time, the effect can be accomplished far more effectively by upstream delay than the minimal effect here ( The Aggie bank - Hilton runoff enters the stream below Telelec). Lowered lake levels at Pontoosuc and Onota would provide the flood storage OR small mini dams made of on site material on contributing streams in the hills and cleanable by manpower with shovel and rake ( The US SCS magnitude of dam is purposefully excluded).

The handling of sediment removed raises four aspects. One- Is the sitz "behind 'Sacco' dump" adjacent to the present parking lot for Wahconah stadium? If the answer is yes, I concur. Two- Spreading sediment would allow historians to search for artifacts. Three- Material for Peoples Park could be put in the observation mountain to be completed and allowed to drain in place or there is room to be spread at the foot of the mountain. Four- The sewer beds should not be excluded for the convenience of transportation from the removal sites besides the Telelec to Linden work area.

The concept of taking sediment from one site i.e. Holmes Rd. bridge and allow the stream to wash more sediment down permits a gradual lowering of the sediment bed and does not disturb the upstream banks. This is the scope of the \$15,000 sediment removal item.

The City needs the experience of both methods. This concept requires a mental (and fiscal) approach to match that of cleaning storm drain catch basins.

The question arises- is an EIS required for this part of the PRA work? or was it an oversight in omission?

The general work at \$6,000 is most appropriately envisioned as the seed money to establish a City program of regular monitoring. The Commonwealth has responded to rush calls in the past but the responsibility is basically that of the City. This is where the river and its three branches exist.

In summary, I see no need to rush on any lowering of the Telelec spillway, if at all.

I see valuable experience in both the major dredging in the Linden Columbus area and the ongoing 'cleaning' maintenance of the ELSEWHERE spot site removal.

I believe some 'what if ' preparations are in order for any aftermath of disturbing the underground flows as a consequence of the blasting and ledge removal.

I see no way of evaluating what is , what improvements are made or where to look when water quality deteriorates without establishing an on going monitoring activity.

With the exception of the Telelec spillway, the program should not wait four years for the Corps study.

Notes The Bel Air dam is gone and Fairview is the name of the one that is left on Wahconah St.

Some of the spot sites for sediment removal are Holmes Rd. bridge, Fairview dam, Crane money mill dam, lower Clapp Park, confluence of E-W branches, Russell dam and New Lenox Rd. bridge.

## BCRPC Water Quality Management Plan

Woods Pond Bypass G-11 I object to this option on several grounds. That kind of money can be better allocated elsewhere. The habitat exists in spite of the specific BOD limit of 5. There are a lot of 'better housekeeping' and finding point sources that are abusing the stream that correction will benefit water quality. These should be put in place and get experience to see if the present situation persists. Augmented flow is a more practical approach. Spot sediment removal at the Woods Pond dam will improve the whole if conducted over a protracted time.

How certain is the assaying of pollutants from the Pittsfield and Lenox landfills?

Catch Basin Missing is the logical extension of present dams as being large catch basins and their maintenance. This is more unique to Pittsfield but should have been included- in both words and fiscal estimates. Refer to BCRPC Tables H-2 and I-8 and PRA portion.

Augmented Flow- Woods Pond and other 4.0 section 2 last paragraph on page G-5 I do not accept the statement. Flow from Onota AND Pontoosuc AND Richmond AND Ashmere could provide the flow. Wells are an additional stated option.

Some states insist on a minimum flow in dammed streams.

The full to the brim water levels maintained on the lakes and ponds are not good practice for flood control.

It is my opinion that there is more real estate value on the stream than there is on the lakefront- dollar for dollar. For that reason alone the water should be shared with the stream- not just what the lake fronters dont want.

Mini dams (refer to PRA portion) will have the effect of slowing the cresting and stretching out the lowering of stream levels. This

also applies to the small dams in town that <sup>have</sup> their gates locked open and assure flow.

US SCS larger dams are recommended against. Large blocks of money and real estate for this are remotely located. Pittsfield specifically is surrounded by a whole bowl of the Berkshire Hills that mostly belong to other communities.

Update Report pages K-6 and 7. This presupposes that data is available. Monitoring when the reservoir water is unsafe to drink because of air pollution and when the river water quality is improving or deteriorating requires a basis of what was, what is and that calls for regular monitoring.

Whether this task can be contracted out to Berkshire Community College is an unknown. Computer storage and printout capability of this data is an obvious requirement.

#### Futures

Sewer extensions must happen. The Lanesboro and Blythewood Dr. in Pittsfield are examples of present day economic funding and assessment practices that must be resolved.

Industrial and Commercial (and even residential) options as to where to take pollutants for disposal like gas, oil and grease from gas stations, cleaning solvents and etc. is necessary to evolve. Presently only some of the abusers (mostly industrial) have permits which require programs of solution. The rest apparently must be ferreted out.

The sub basin approach to advisory committee work I applaud. The map J-1 clearly shows that real boundaries cross multiple political boundaries. The present lethargy can only be penetrated by bringing the matters closer in to this branch of the river, this shoreline and this runoff area.

## Flood Control

Already referred to are the sediment removal, lower lake levels, catch basin dam maintenance and mini dams.

The concern here is that the study will include the big alternates and possibly the 'no build' alternate. Some studies elsewhere in this country have shown that the mini dam concept has been more attractive from lower total dollars expended and ease of maintenance. The 1968 US SCS Report of dam sites in Berkshire County does not deal with anything smaller than a quarter of a million dollars. How will the County or its communities be assured that all reasonable options were examined and not just those within the funding scope of that governmental agency? A restricted study of that nature has little value to Berkshire County.

\*U.S. GOVERNMENT PRINTING OFFICE: 1978-600-333/228

Lon Nordeen

2 July 78



